

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Joseph M. Strickland, Court of Common Pleas Judge

Appeal Case Number: 2023-000491
Lower Court Case No. 2021-CP-40-00895

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SC Court of Appeals

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE FOR RESIDENTIAL
ASSET SECURITIZATION TRUST 2005-A8CB
MORTGAGE PASS-THROUGH CERTIFICATES
SERIES 2005-H

Respondent,

v.

JOHN C. NELUMS, DELMARSHI NELUMS, and
WOODLAKE HOMEOWNERS' ASSOCIATION,
INC.,

Defendants,

Of Which JOHN C. NELUMS and DELMARSHI
NELUMS are the Appellants.

MOTION TO BE RELIEVED AS COUNSEL FOR
APPELLANTS AND TO PROVIDE APPELLANTS
WITH ADDITIONAL TIME TO FILE THEIR BRIEF

Jeff Barnes, Esq. and W.J. Barnes, P.A. move to be relieved as co-counsel for Appellants and as grounds state that Appellants have refused to communicate with Mr. Barnes as to the pending appeal and also that Appellants are in breach of their contract with W.J.Barnes, P.A.

In view of this Motion, and the fact that Mr. Barnes was retained as primary appellate counsel, it is requested that Appellants be given thirty (30) additional days to file their Brief, whether they do so through their co-counsel Sean Adegbola, Esq. or on their own.

WHEREFORE, Jeff Barnes, Esq. and W.J. Barnes, P.A. move to be relieved as counsel for

Appellants for the reasons set forth, and for any other and further relief which is just and proper.

May 1, 2023

/s/ Jeff Barnes, Esq.

Jeff Barnes, Esq.

PHV withdrawing counsel

W.J. Barnes, P.A.

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