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Sep 14 2023

SC Court of Appeals

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM SUMTER COUNTY  
Court of Common Pleas  
The Honorable Benjamin H. Culbertson, Circuit Court Judge  
Case No.: 2021-CP-43-01284

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Appellate Case No. 2023-001171

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Benjamin Nelson Strange .....Appellant,

v.

Wells Fargo Bank, N.A.....Respondent.

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MOTION TO WITHDRAW AS COUNSEL

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Laurel R.S. Blair (“*Ms. Blair*”) and the law firm of Womble Bond Dickinson (US) LLP (“*WBD*”) respectfully move the Court for leave to withdraw as counsel of record for Wells Fargo Bank, N.A., (“*Wells Fargo*”), the Respondent in this action, pursuant to Rule 264(b), SCACR. The grounds for this motion are as follows:

1. The undersigned counsel represents that justifiable cause exists for an Order approving counsel’s withdrawal, and such withdrawal will not leave Wells Fargo unrepresented in this matter, as, on July 27, 2023, at the direction of Wells Fargo, T. Richmond McPherson, III, Esq. of McGuireWoods LLP, entered an appearance as counsel of record for Wells Fargo. Pursuant to said Notice of Appearance, a copy of which is attached hereto as Exhibit “A” and incorporated herein by reference, Mr. McPherson and McGuireWoods, LLP are responsible for representing Wells Fargo’s interests in this matter going forward. Accordingly, allowing WBD

and Ms. Blair to withdraw as counsel will not prejudice any of the parties in this matter. Nor will Ms. Blair's or WBD's withdrawal serve to unduly delay this matter as briefing in this matter has not yet commenced. Further, the undersigned represents to this Court that Wells Fargo consents to this motion and has directed that this matter be handled by Mr. McPherson and McGuireWoods LLP.

2. The undersigned provides the attached Proof of Service that this Motion has been served on Jennifer Dowd Nichols (counsel for Appellant) and T. Richmond McPherson, III (counsel for Respondent).

This the 14<sup>th</sup> day of September, 2023

s/Laurel R.S. Blair

Laurel R.S. Blair

(S.C. Bar No. 66338)

**Womble Bond Dickinson (US) LLP**

5 Exchange Street

Charleston, SC 29401

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*Counsel for Respondent Wells Fargo Bank,  
N.A.*

# EXHIBIT A

**RECEIVED**

**Jul 27 2023**

**SC Court of Appeals**

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Wells Fargo Bank ..... Respondent,

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**NOTICE OF APPEARANCE OF COUNSEL**

PLEASE TAKE NOTICE that the undersigned attorney, T. Richmond McPherson, III, of the Law firm of McGuireWoods LLP, files this Notice of Appearance for the purpose of representing Respondent Wells Fargo Bank.

Service of all pleadings, papers, and other filings should be made on Respondent's counsel at the address listed below.

**[SIGNATURE ON NEXT PAGE]**

This the 27<sup>th</sup> day of July, 2023.

*s/ T. Richmond McPherson, III*

---

T. Richmond McPherson, III  
(SC Bar ID #80432)

**MCGUIREWOODS LLP**

201 North Tryon Street, Suite 3000

Charlotte, North Carolina 28202

Telephone: (704) 343-2038

Facsimile: (704) 444-8783

[rmcpherson@mcguirewoods.com](mailto:rmcpherson@mcguirewoods.com)

*Attorneys for Respondent*

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Wells Fargo Bank ..... Respondent,

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**PROOF OF SERVICE**

The undersigned hereby certifies that on July 27, 2023 a copy of the Notice of Appearance was served on counsel for Appellant by email counsel a copy of the same to the following via her email address as maintained in the Attorney Information System:

Jennifer Dowd Nichols, *Attorneys for Appellant*  
jennifer@nicholspricelaw.com

Enclosed with this Proof of Service is a copy of the transmittal email to counsel.

**[SIGNATURE ON NEXT PAGE]**

This the 27<sup>th</sup> day of July, 2023.

*s/ T. Richmond McPherson, III*

\_\_\_\_\_  
T. Richmond McPherson, III

(SC Bar ID #80432)

**MCGUIREWOODS LLP**

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Charlotte, North Carolina 28202

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[rmcpherson@mcguirewoods.com](mailto:rmcpherson@mcguirewoods.com)

*Attorneys for Respondent*

## Stewart, Cathy L.

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**From:** Stewart, Cathy L.  
**Sent:** Thursday, July 27, 2023 4:16 PM  
**To:** 'jennifer@nicholspricelaw.com'  
**Cc:** McPherson, T. Richmond III; Stewart, Cathy L. (Cstewart@mcguirewoods.com)  
**Subject:** Appellate Case No. 2023-001171; Wells Fargo Bank v. Benjamin Nelson Strange  
**Attachments:** 2023-07-27 Notice of Appearance (2023-001171).pdf; 2023-07-27 Proof of Service (2023-001171).pdf

Good Afternoon,

Attached please find Respondent's Notice of Appearance and (draft) Proof of Service, which will be filed with the Court momentarily.

Regards,

**Cathy L. Stewart**

Senior Paralegal  
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**McGuireWoods**

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PROOF OF SERVICE

The undersigned hereby certifies that on September 14, 2023 a copy of the Motion to Withdraw as Counsel for Respondent was served on all counsel of record by emailing a copy of the same to:

Jennifer Dowd Nichols, Esquire  
PO Box 836  
1413 Main Street  
Newberry, South Carolina 29108  
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*Attorney for Appellant*

T. Richmond McPherson, III  
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*Attorney for Respondent*

s/Laurel R.S. Blair  
Laurel R.S. Blair  
(S.C. Bar No. 66338)  
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*Counsel for Respondent Wells Fargo Bank,  
N.A.*