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JAN 18 2024  
SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court Of Common Pleas

The Honorable Joseph Strickland, Master-In-Equity

Case No.: 2022-CP-40-05280, Circuit Court  
Appeals Court Docket No.: 2024-000063

U.S. Bank Trust National  
Association, as Trustee of the Chalet  
Series IV Trust, ..... Respondent,

v.

Talmage Martin aka Talmage Russell Lewis Martin; Nicole S. Martin Midland Funding LLC;  
Lake Carolina Master Association, Inc.; South Carolina Department of Probation, Parole, and  
Pardon; Richland County Clerk of  
Court.....Appellant.

**NOTICE OF MOTION AND MOTION TO BE RELIEVED AS COUNSEL PURSUANT  
TO SCAR RULE 264 (b)**

This Firm represented Nicole Martin (Adderly) and Talmage Martin (the "Martins") with respect to a Motion to Set Aside a Default Judgment and Foreclosure Sale filed in the Court of Common Pleas for Richland County. The hearing on the Motion was held on December 11, 2023, before the Honorable Joseph Strickland, Richland County Master-In-Equity. Judge Strickland denied the requested relief.

The Martins never paid the full amount of their initial retainer for the Motion in the lower court. The Letter of Engagement with the Martins specifically stated that the scope of representation did not extend to any appeals to a higher court. After the hearing, I discussed the

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**Kenneth A. Davis**  
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January 18, 2024

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SC Court of Appeals

VIA ELECTRONIC MAIL AND U.S. MAIL

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: U.S. Bank Trust v. Talmage Martin, et al.  
Appeals Court Docket No.: 2024-000063

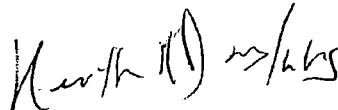
Dear Ms. Kitchings:

Enclosed for filing please find a Motion to be Relieved as Counsel. The original motion and filing fee will be hand delivered to Court.

By copy of this letter, we are today serving this pleading on all parties of record.

Thank you for your assistance.

Sincerely,

  
Kenneth A. Davis

/hhg

Enclosures

cc: J. Pamela Price, Esq.  
John P. Fetner, Esq.  
Brian L. Campbell, Esq.  
January Taylor, Esq.  
Kimila L. Wooten, Esq.  
Steven C. Hippolyte, Esq.  
Meredith L. Coker, Esq.  
Talmage Martin  
Nicole Martin (Adderly)