

SOUTH CAROLINA COURT OF APPEALS

Nicholas F. Wilson)
)
Appellant,)
)
v.)
)
Janet P. Gochenour; Janet P. Gochenour)
Trustee; James B. Parker, Sr., Mary Ann)
Parker; Kenneth Gregory Moore; R & G)
Corp., d/b/a Century 21 The Harrelson Group;)
Patton Development SC, LLC; Flagstar Bank,)
N.A., Sonia M. Raymond; Raymond Law)
Firm, P.A.;)

Respondents.)

Appellate Case No.: 2024-000440

**Motion to Be Relieved as Counsel for
Janet P. Gochenour & Janet P. Gochenour
Trustee**

RECEIVED
Jun 26 2024
SC Court of Appeals

PLEASE TAKE NOTICE that pursuant to Rule 240 of the Appellate Court Rules, that counsel for Respondents Janet P. Gochenour and Janet P. Gochenour Trustee, William J. Luse hereby moves to be Relieved as Counsel for Respondents.

GROUND FOR RELIEF

Respondents Janet P. Gochenour and Janet P. Gochenour Trustee have elected not to retain the services of attorney William J. Luse for the Appellate process and therefore attorney William J. Luse requests to be relieved as counsel for Respondents Janet P. Gochenour and Janet P. Gochenour Trustee. Attorney William J. Luse certifies that he has advised Respondents Janet P. Gochenour and Janet P. Gochenour Trustee how to obtain a Court Appointed Attorney and/or how to proceed Pro Se. (See attached Affidavit)

CONCLUSION

Based on the above grounds for relief and attached affidavit, William J. Luse counsel for Respondents Janet P. Gochenour and Janet P. Gochenour Trustee requests that he be relieved as counsel.

Respectfully submitted,

S/William J. Luse

William J. Luse, Esquire

Federal ID No: 9736

917 Broadway Street

Myrtle Beach, SC 29577

Phone: 843-839-4795

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bill@getlusenow.com

June 26, 2024,

SOUTH CAROLINA COURT OF APPEALS

Nicholas F. Wilson)	
)	
Appellant,)	Appellate Case No.: 2024-000440
)	
v.)	
)	
Janet P. Gochenour; Janet P. Gochenour)	AFFIDAVIT OF WILLIAM J. LUSE
Trustee; James B. Parker, Sr., Mary Ann)	ATTORNEY FOR RESPONDENTS
Parker; Kenneth Gregory Moore; R & G)	JANET P. GOCHENOUR AND JANET P.
Corp., d/b/a Century 21 The Harrelson Group;)	GOCHENOUR TRUSTEE
)	
Patton Development SC, LLC; Flagstar Bank,)	
N.A., Sonia M. Raymond; Raymond Law)	
Firm, P.A.;)	
)	
Respondents.)	

I William J. Luse, attorney for Respondents Janet P. Gochenour and Janet P. Gochenour Trustee hereby certify that Respondents Janet P. Gochenour and Janet P. Gochenour Trustee have chosen not to retain my services for this matter through the Appellate process and that I was only retained to represent them at the State Court level. In addition, I, William J. Luse, certify that I have advised Respondents Janet P. Gochenour and Janet P. Gochenour Trustee how to obtain a Court Appointed attorney and/or how to proceed in this Appellate process Pro Se should they desire to do so.



William J. Luse, Esquire

June 26 2024

SOUTH CAROLINA COURT OF APPEALS

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 Appellant,)
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 Janet P. Gochenour; Janet P. Gochenour)
 Trustee; James B. Parker, Sr., Mary Ann)
 Parker; Kenneth Gregory Moore; R & G)
 Corp., d/b/a Century 21 The Harrelson Group;)
 Patton Development SC, LLC; Flagstar Bank,)
 N.A., Sonia M. Raymond; Raymond Law)
 Firm, P.A.;)
 _____ Respondents.)

Appellate Case No.: 2024-000440

PROOF OF SERVICE



PROOF OF SERVICE

I certify that I have served the foregoing Motion to Be Relieved as Counsel with attached attorney Affidavit for Respondents Janet P. Gochenour and Janet P. Gochenour on the following counsel or record using the primary email address listed in the Attorney Information System and as to Pro Se Respondents, via U.S. mail.

Wesley D. Few, Esq.
Post Office Box 9398
Greenville, South Carolina 29604
wes@wesleyfew.com
Attorney for Appellant

James B. Parker (Pro Se)
James B. Parker, Sr. (Pro Se)
Mary Ann Parker, (Pro Se)
919 Waterton Avenue
Myrtle Beach, SC 29579

Claude Townsend Prevost, III, Esq.
Joseph Lucas Richardson, Esq.
Collins & Lacy, PC
P.O. Box 12487
1330 Lady Street
Columbia, SC 29201

lrichardson@collinsandlacy.com

cprevost@collinsandlacy.com

Attorneys for Respondent Kenneth Gregory Moore and R & G Corp. d/b/a Century 21 The Harrelson Group

Robert Bruce Wallace, Esq.
Maynard Nexsen, PC
205 King Street, Suite 400
Charleston, SC 29401

bwallace@maynardnexsen.com

Attorney for Respondent Sonia M. Raymond and Raymond Law Firm, P.A.

Matthew Douglas Patterson, Esq.
Blake T. Williams, Esq.
Nelson Mullins Riley & Scarborough, LLP
1320 Main Street, 17th Floor (29201)
P.O. Box 11070
Columbia, SC 29201

Matt.pattersonnelsonmullins.com

Blake.williams@nelsonmullins.com

Attorneys for Respondent Flagstar Bank, N.A.

Alexander Hray, Jr., Esq.
Law Office of Alexander Hray, Jr.
389 E. Henry Street, Ste. 107
Spartanburg, SC 29302

Lex@lexhray.com

Attorney for Respondent Patton Development SC, LLC

Janet P. Gochenour
Janet P. Gochenour Trustee
2015 Hazlette Loop
Conway, SC 29526

Respondents currently represented by William J. Luse

S/William J. Luse

William J. Luse, Esquire

917 Broadway Street

Myrtle Beach, SC 29577

bill@getlusenow.com

Attorney for Respondents Janet P. Gochenour
& Janet P. Gochenour Trustee

Law Office of William J. Luse

917 Broadway Street
Myrtle Beach, SC 29577
Phone: 843-839-4795
Fax: 843-839-4815
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June 26, 2024

VIA US FIRST CLASS MAIL

Mr. James B. Parker, Pro Se Defendant
Mary Ann Parker, Pro Se Defendant
919 Waterton Avenue
Myrtle Beach, SC 29579

Mrs. Janet P. Gochenour
Janet P. Gochenour Trustee
2015 Hazlette Loop
Conway, SC 29526

Re: *Nicholas F. Wilson v. Janet P. Gochenour, et al.*
Court of Appeals Case No: 2024-000440
Respondents Janet P. Gochenour and Janet P. Gochenour Trustee's Motion for Attorney
William J. Luse to be relieved as counsel.

To Whom It May Concern:

Enclosed for service upon you, please find a copy of Respondents Janet P. Gochenour and Janet P. Gochenour Trustee's Motion for Attorney William J. Luse to be relieved as counsel and affidavit of attorney William J. Luse for the above referenced matter.

Sincerely,

S/William J. Luse

William J. Luse, Esq.

RECEIVED

Jun 26 2024

SC Court of Appeals

Law Office of William J. Luse

917 Broadway Street
Myrtle Beach, SC 29577
Phone: 843-839-4795
Fax: 843-839-4815
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June 26, 2024

VIA EMAIL AND US FIRST CLASS MAIL

Ms. Jenny Abbot Kitchings
South Carolina Court of Appeals-Clerk of Court
P.O. Box 11629
Columbia, SC 29211
Email: ctappfilings@sccourts.org

Re: *Nicholas F. Wilson v. Janet P. Gochenour, et al.*
Court of Appeals Case No: 2024-000440
Respondents Janet P. Gochenour and Janet P. Gochenour Trustee's Motion for Attorney
William J. Luse to be relieved as counsel.

Dear Ms. Kitchings:

Enclosed please find the original and six copies of Respondents Janet P. Gochenour and Janet P. Gochenour Trustee's Motion for Attorney William J. Luse to be relived as counsel, with exhibit affidavit of attorney William J. Luse and the Certificate of Service. I have also enclosed a check made payable to the SC Court of Appeals, in the amount of \$50.00 for the filing fee.

Sincerely,

S/William J. Luse
William J. Luse

Enclosures

Cc: Wesley Few, Alexander Hray, Jr., J. Lucas Richardson, Claude T. Prevost, III, Matthew D. Patterson, Blake T. Williams, Bruce Wallace