

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

69715

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

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SEP 10 2013

DeAndrea G. Benjamin, Circuit Court Judge

SC Court of Appeals

Case No. 2011-CP-40-05170R

Appellate Case No. 2012-211466

Jerry Gadson and Shelia Gadson, Appellants,

v.

Caroline Deloatch and Bank of America, Respondents.

**Respondents' Motion to Allow Candace C. Jackson to
Withdraw as Counsel of Record**


Pursuant to Rules 264(b) of the South Carolina Appellate Court Rules, Respondents Caroline Deloatch and Bank of America ("Respondents") file this Motion to Allow Candace C. Jackson to Withdraw as Counsel of Record. The basis for this motion is that Candace C. Jackson no longer represents Respondents in this appeal.

Ms. Jackson resigned from Nelson Mullins on May 25, 2012, to accept the position as Special Advisor to the National Director, Minority Business Development Agency, U.S. Department of Commerce. Respondents have been represented from the outset of this appeal by Michael J. Anzelmo and Thad H. Westbrook of Nelson Mullins. See Notice of Appearance filed July 10, 2012. Mr. Anzelmo and Mr. Westbrook will continue representation of Respondents until final disposition. The

withdrawal of Ms. Jackson will not impact representation of Respondents, prejudice Respondents in any manner, or delay this appeal.

The change of employment by Ms. Jackson constitutes justifiable cause to allow withdrawal as counsel for Respondents, especially in light of the fact that Mr. Anzelmo and Mr. Westbrook continue to represent Respondents in this action. Thus, Respondents request that Candace C. Jackson be allowed to withdraw from representation of them in this action, and that all notices, letters, and other communications be directed solely to Michael J. Anzelmo and Thad H. Westbrook of Nelson Mullins.

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By: 
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Attorneys for Respondents Caroline Deloatch and
Bank of America

Columbia, South Carolina

September 10, 2013

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APPEAL FROM RICHLAND COUNTY
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DeAndrea G. Benjamin, Circuit Court Judge

Case No. 2011-CP-40-05170R

Caroline Deloatch and Bank of America, Respondent,
v.
Jerry Gadson and Shelia Gadson, Appellant.

PROOF OF SERVICE

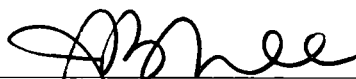
I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for defendants, Caroline Deloatch and Bank of America, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings: Respondents' Motion to Allow Candace C. Jackson to Withdraw as Counsel of Record

Counsel Served:
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SC Court of Appeals

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September 10, 2013

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September 10, 2013

The Honorable Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
1015 Sumter Street - 5th Floor
Columbia, SC 29201

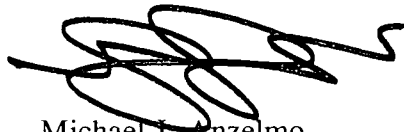
RE: Jerry Gadson and Sheila Gadson vs. Caroline Deloatch and Bank of America
C/A No. 2009-CP-40-03817
Our File No. 05100/02104

Dear Ms. Kitchings:

Enclosed please find an original and seven copies of Respondents' motion to Allow Candace C. Jackson to Withdraw as Counsel of Record in the above-referenced matter. Please file the original and return a clocked-in copy to me via our courier. Should you have any questions, please do not hesitate to contact me.

By copy of this letter, I am hereby serving all parties of interest.

Very truly yours,



Michael J. Anzelmo

MJA:jlee

Enclosures

cc: Mary P. Miles, Esquire
George J. Sukatos