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Jun 25 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM AIKEN COUNTY
CIRCUIT COURT

Judge Martha Rivers

Case No. 2018-CP-02-01903

Gloria Allen, Personal Representative of the Estate of Hellen Williams, Appellant,

v.

Estate of Calvin Warren, Estate of Diane Warren, Estate of Travis Robinson, and Marcus
Williams, Defendants,

of which Estate of Calvin Warren, Estate of Diane Warren and Estate of Travis Robinson are the
Respondents.

MOTION TO BE RELIEVED

Counsel for Appellant hereby moves to be relieved as counsel in this appeal, the grounds for
such motion being that an insurmountable difference of opinion has arisen which makes it
impossible for counsel to continue representation. Counsel further moves that the Appellant be
granted an additional extension of time to file to allow for the Appellant to obtain other Counsel.

June 23, 2025

s/ John W. Harte SC Bar 2773
John Harte Law
PO Box 7215

Aiken, S.C., 29804
803 226 0755
john@jwhartelaw.com

Other Counsel of Record:
Damon C. Włodarczyk, Esq.
PO Box 12009
Columbia, SC 29211
damonw@hnblaw.com

From: [Gloria Allen](#)
To: [Krissy Heise](#)
Cc: [John Harte](#); [Pam Williams](#)
Subject: Re: Appeal Motion to be Relieved
Date: Tuesday, June 24, 2025 4:31:01 PM

Received. Thank you Krissy. It was a real pleasure working with you, Attorney Harte, Mrs. Harte, Dalton and the entire office staff. I cannot thank you all enough for all that you did. I knew from the beginning that it was a difficult case. However, I simply cannot give up. My mom was an innocent victim who was caught in the middle. And so was my sister and brother-in-law. **I just want justice for all of them.** I will continue to move forward with my fight for justice if I can find an attorney who is willing to take it.

Again, thank you all ever so much.

G. Allen

On Tue, Jun 24, 2025 at 3:15 PM Krissy Heise <krissy@jwhartelaw.com> wrote:

Ms. Allen,

Attached is a copy of the Motion to be Relieved that will be filed today. I have also placed a copy in the mail for you.

I enjoyed working with you and wish you the best of luck as you move forward with the appeal.

* Please confirm receipt of this email by reply all.

Sincerely,

Krissy Heise
Paralegal to John Harte and Dalton Cooper
PO Box 7215
Aiken, SC 29804
803-226-0755

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From: [Damon Wlodarczyk](#)
To: [John Harte](#)
Cc: [Krissy Heise](#)
Subject: RE: Allen motion
Date: Wednesday, June 25, 2025 3:15:31 PM

No objections. At least we still have the Foster/Airbnb case!

Hope you're well. Damon

Damon C. Wlodarczyk
Attorney and Counselor at Law
803.758.6000 Telephone
Email: damonw@hnblaw.com

From: John Harte <john@jwhartelaw.com>
Sent: Wednesday, June 25, 2025 3:13 PM
To: Damon Wlodarczyk <DamonW@hnblaw.com>
Cc: Krissy Heise <krissy@jwhartelaw.com>
Subject: FW: Allen motion

Damon,

I am asking to be relieved so that Ms. Allen can have another attorney look at the record. Please review the attached motion which I am serving on you via this email and let me know if you will consent.

John

john@jwhartelaw.com
PO Box 7215
Aiken, S.C., 29803
803 226 0755
803 634 4198 (Cell)
www.jwhartelaw.com

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From: Krissy Heise <krissy@jwhartelaw.com>

Sent: Wednesday, June 25, 2025 11:27 AM

To: John Harte <john@jwhartelaw.com>

Subject: Allen motion

If not done so already, will you please serve this motion on Damon by email so that I can file it? If you already did it, will you forward me the email?

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Appellant,

v.

Estate of Calvin Warren, Estate of Diane Warren, Estate of Travis Robinson, and

Marcus Williams, Defendants,

of which Estate of Calvin Warren, Estate of Diane Warren and Estate of Travis

Robinson are the Respondents.

PROOF OF SERVICE

I certify that I have served Damon C. Włodarczyk, Counsel for the Respondents, with the Motion to be Relieved by email to his registered AIS address on June 25, 2025 and the Appellant Gloria Allen via email and US mail to the below address on June 24, 2025:

P.O. Box 1336
Aiken, SC 29803.

June 25, 2025

s/ John W. Harte SC Bar 2773
s/ Dalton P. Cooper SC Bar 105959
John Harte Law

PO Box 7215
Aiken, S.C., 29804
803 226 0755
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Other Counsel of Record:
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PO Box 12009
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