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SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appellate Case No. 2013-001649

APPEAL FROM AIKEN COUNTY
Court of Common Pleas

The Honorable Doyet A. Early, III Circuit Court Judge

ALAN WILSON, in his Capacity as Attorney General
of South Carolina, and others,. . . . . Plaintiffs,

v.

ALBERT H. DALLAS and others, ... Defendants,

Of whom Adele Pope, Individually and on behalf of Others Under South Carolina Trust Code
Section 62-7-405, is . . . . . Appellant,

And Terry Brown, Forlando Brown, James B., David G. Cannon, Albert H. Dallas and
Tommie Rae Hynie are . . . . . Respondents,

And Alan Wilson in his Capacity as Attorney General of South Carolina, Deanna J. Brown
Thomas and Robert L. Buchanan, Jr., are. . . . . Additional Interested Persons.

In Re: The Estate of James Brown and The James Brown 2000 Irrevocable Trust u/a/d
August 1, 2000 . . . . . Respondents.

PETITION TO WITHDRAW AS COUNSEL

COME NOW the Matt Bodman and David B. Bell attorneys of record for the

Respondents Forlando Brown and Terry Brown and pray this Court to enter its Order granting leave to withdraw as counsel for Respondents Forlando Brown and Terry Brown, and as grounds therefore would show the Court:

1. Forlando Brown and Terry Brown have informed Matt Bodman and David B. Bell that they no longer wish to be represented by them in this matter. Forlando Brown and Terry Brown have hired Scott Keniley of the Atlanta firm of Keniley Kumar, LLC to serve as their attorney. Matt Bodman and David B. Bell have been directed to cease all representation on behalf of Forlando Brown and Terry Brown.

2. The last known address of Forlando Brown and Terry Brown is: 13 Brown Street, Toccoa, GA 30577.

3. Matt Bodman and Terry Brown provide the attached certification that this motion has been served on Forlando Brown and Terry Brown today. Moreover, Matt Bodman and David B. Bell have been informed by Scott Keniley that they must withdraw as counsel for Terry Brown.

Wherefore, Matt Bodman and David B. Bell pray that this Court enter its Order allowing withdrawal herein.

Respectfully submitted this 23rd day of July, 2014.

MATT BODMAN
SOUTH CAROLINA BAR NO. 11143
DAVID B. BELL
GEORGIA STATE BAR NO. 047750

1500 CALHOUN STREET
COLUMBIA, SC 29201
(803) 806-8605

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PROOF OF SERVICE

I, the undersigned attorney do hereby certify that I have served all counsel in this action with a copy of the Petition to Withdraw by first class mail this 23rd day of July, 2014:

Mr. Robert Rosen
Rosen Law Firm, LLC
18 Broad Street, Suite 201
Charleston, SC 29401

Mr. A. Peter Shahid, Jr.
Shahid Law Office, LLC
89 Broad Street
Charleston SC 29401

Mr. David G. Cannon
P.O. Box 865
Barnwell, SC 29812

Ms. Adele Pope
1228 Walnut Street
Newberry, SC 29108

Mr. Eugene C. Covington, Jr.
P.O. Box 2343
Greenville, SC 29602

Mr. J. David Black
Nexsen Pruet, LLC
PO Drawer 2426
Columbia SC 29202

Mr. Terry Brown
13 Brown Street
Toccoa, GA 30577

Mr. Forlando Brown
13 Brown Street
Toccoa, GA 30577

Mr. Scott Keniley
Keniley Kumar, LLC
Two Ravinia Dr., Suite 500
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Wednesday, July 23, 2014

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1205 Pendleton Street, Brown Building
Columbia, SC 29201

RE: *Michael Deon Brown, James Curtis, and Jane Doe and John Doe Numbers I, II, III and IV, by their proposed Guardian Ad LItem and Adele Pope, as Creditor/Proponent of Will of James Brown dated June 15, 1999 and on behalf of others under S.C. Trust Code 62-7-405 v. James B., Terry Brown, Tommie Rae Hynie and David Sojourner Jr. – In Re: the Estate of James Brown a/k/a James Joseph Brown*
Appellate Case No. 2013-001649

Dear Ms. Kitchings:

I am enclosing the original and 6 copies of the Petition To Withdraw as Counsel for Terry Brown and Forlando Brown in the above-captioned case. Please file the original and return the clocked copy through the bearer of these documents.

By copy of this letter, I am serving this document to all parties in this action as noted on the Proof of Service.

With warmest personal regards, I am,

Sincerely,

Matt Bodman

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