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STATE OF SOUTH CAROLINA
In the Court of Appeals

Appellate Case No. 2014-000794

APPEAL FROM AIKEN COUNTY
Court of Common Pleas

RECEIVED

JUL 21 2014

The Honorable Doyet A. Early, III Circuit Court Judge

SC Court of Appeals

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 Appellants,

v.

James B., Terry Brown, Tommie Rae Hynie and David Sojourner, Jr., Respondents.

IN RE:

THE ESTATE OF JAMES BROWN, a/k/a JAMES JOSEPH BROWN

MOTION TO WITHDRAW AS COUNSEL

COME NOW Matt Bodman and David B. Bell attorneys of record for the Respondent
Terry Brown and pray this Court to enter its Order granting leave to withdraw as counsel for
Respondent Terry Brown, and as grounds therefore would show the Court:

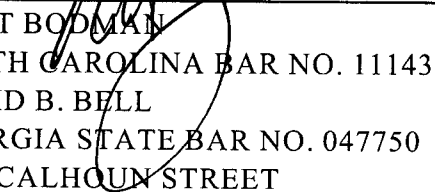
1. Terry Brown has informed Matt Bodman and David Bell that he no longer wishes to have them represent him in this matter. Terry Brown has hired Scott Keniley of the Atlanta firm of Keniley Kumar, LLC to serve as his attorney. Matt Bodman and David Bell have been directed to cease all representation on behalf of Terry Brown.

2. The last known address of the Plaintiff herein is: 13 Brown Street, Toccoa, GA 30577.

3. The undersigned provides the attached certification that this motion has been served on Terry Brown today. Moreover, the undersigned have been informed by Scott Keniley that they must withdraw as counsel for Terry Brown.

Wherefore, the undersigned pray that this Court enter its Order allowing withdrawal herein.

Respectfully submitted this 21st 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

STATE OF SOUTH CAROLINA
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I, the undersigned attorney do hereby certify that I have served all counsel in this
action with a copy of the Motion to Withdraw by first class mail this 21st day of
July, 2014:

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

Mr. Louis Levenson
Levenson and Associates
125 Broad Street, SW
Atlanta, GA 30303

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

Mr. William J. Barr
108 N. Academy St.
Kingstree, SC 29556

Mr. John Fisher Beach
1501 Main Street, Fifth Floor
Columbia SC 29202

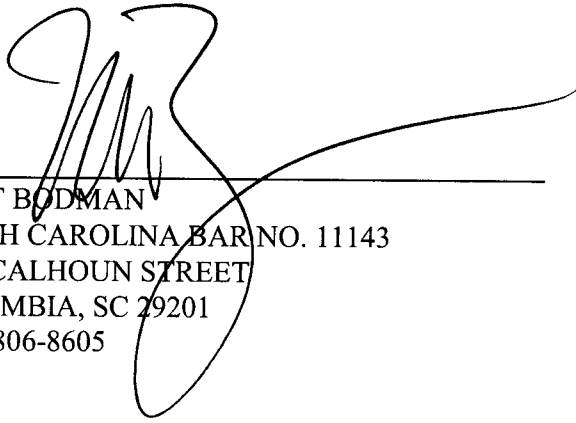
Mr. James Mixon Griffin
Lewis Babcock & Griffin, LLP
P.O. Box 11208
Columbia, SC 29211

Mr. S. Alan Medlin
1713 Phelps Street
Columbia, SC 29205

Ms. Adele Pope
1228 Walnut Street
Newberry, SC 29108

Mr. Terry Brown
13 Brown Street
Toccoa, GA 30577

Mr. Scott Keniley
Keniley Kumar, LLC
Two Ravinia Dr., Suite 500
Atlanta GA 30346



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matt@mattbodmanlaw.com • www.mattbodmanlaw.com

Monday, July 21, 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

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SC Court of Appeals

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. 2014-000794

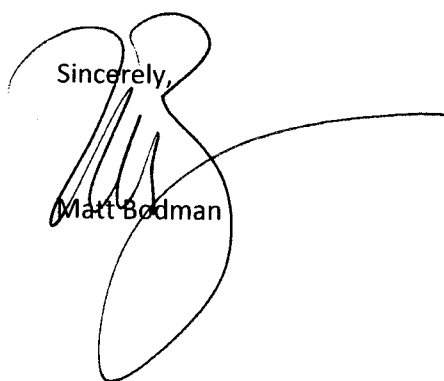
Dear Ms. Kitchings:

I am enclosing the original and 6 copies of the Petition To Withdraw as Counsel for Terry 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