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**S.C. Supreme Court**

STATE OF SOUTH CAROLINA

In the Supreme Court

APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

The Honorable Doyet A. Early, III, Circuit Court Judge

Appellate Case No. 2014-001279

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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, Petitioner,

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

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**PETITION TO WITHDRAW AS COUNSEL**

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

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

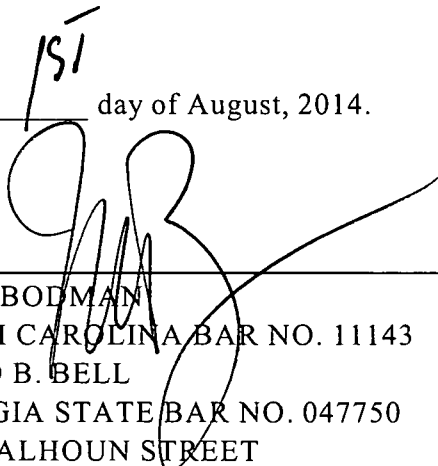
1. Terry Brown and Forlando Brown have informed Matt Bodman and David Bell that they no longer wish to have Matt Bodman and David B. Bell represent them in this matter. Terry Brown and Forlando Brown have hired Scott Keniley of the Atlanta firm of Keniley Kumar, LLC to serve as their attorney. Matt Bodman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

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

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

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

Respectfully submitted this 15<sup>th</sup> day of August, 2014.



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MATT BODMAN  
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DAVID B. BELL  
GEORGIA STATE BAR NO. 047750  
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**PROOF OF SERVICE**

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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 18 day of August, 2014:

The Hon. Alan M. Wilson  
Attorney General  
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Ms. Adele Pope  
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P. O. Box 865  
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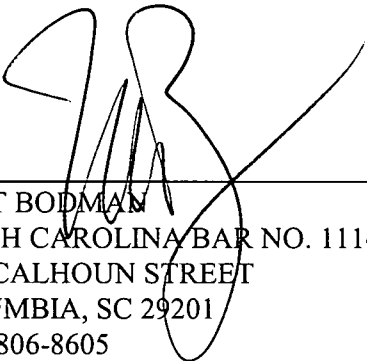
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Mr. Scott Keniley  
Keniley Kumar, LLC  
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