

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge

Case No. 2008-CP-38-1024

Appellate Case No. 2014-001683

114207

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NOV 19 2014

SC Court of Appeals

Wells Fargo Bank, N.A., Respondent,

v.

Dorothy Sistrunk, Appellant.

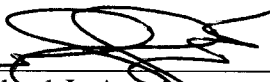
**Respondent’s Motion to Allow James H. Burns to
Withdraw as Counsel of Record**

Pursuant to Rule 264(b) of the South Carolina Appellate Court Rules, Respondent Wells Fargo Bank, N.A. (“Respondent”) files this Motion to Allow James H. Burns to Withdraw as Counsel of Record. The basis for this motion is that James H. Burns no longer represents Respondent in this appeal.

Mr. Burns resigned from Nelson Mullins on November 19, 2014, to accept the position as Chief of Staff for Governor Nikki R. Haley. Respondent has been represented from the outset of this appeal by Michael J. Anzelmo and Elizabeth Scott Moise of Nelson Mullins. Mr. Anzelmo and Mrs. Moise will continue representation of Respondent. The withdrawal of Mr. Burns will not impact representation of Respondent, prejudice Respondent in any manner, or delay this appeal.

The change of employment by Mr. Burns constitutes justifiable cause to allow withdrawal as counsel for Respondent, especially in light of the fact that Mr. Anzelmo and Mrs. Moise continues to represent Respondent in this action. Thus, Respondent requests that James H. Burns be allowed to withdraw from representation of it, and that he be removed from all notices, letters, and other communications in this appeal.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 
Michael J. Anzelmo
SC Bar No. 72933
James H. Burns
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Attorneys for Wells Fargo Bank, N.A.

Columbia, South Carolina
November 19, 2014

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Proof of Service

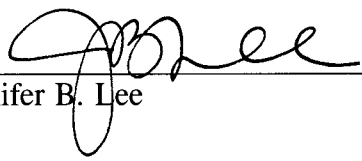
I, the undersigned administrative assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Plaintiff Wells Fargo Bank, N.A., do hereby certify that I have served all parties in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by certified United States Mail, return receipt requested, postage prepaid, to the following address(es):

Pleadings:

Respondent's Motion to Allow James H. Burns to Withdraw as counsel of Record

Party Served:

pro se Defendant
Ms. Dorothy Sistrunk
423 Bayne Street
Orangeburg, SC 29115


Jennifer B. Lee

November 19, 2014

Nelson Mullins

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November 19, 2014

Hand Delivered

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

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SC Court of Appeals

RE: Wells Fargo Bank, N.A. v. Dorothy Sistrunk
Wells Fargo Matter #: 0362522-01
Case No.: 08-CP-38-1024
NMRS File No.: 10275/01528

Dear Ms. Kitchings:

Enclosed please find an original and seven copies of a Motion to Allow James H. Burns 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 opposing parties.

Very truly yours,



Michael J. Anzelmo

MJA:jlee
Enclosures

cc: Ms. Dorothy Sistrunk