

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

James E. Chellis, Master in Equity

Case No. 2013-CP-18-183 consolidated with
Case No. 2013-CP-18-74

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DEC 18 2014
SC Court of Appeals
74524

Molly M. Morphew,

Appellant

v.

Thomas Ferro, Lorraine Ferro,
Stephen Dudek, and Doreen Cross,

Respondents.

MOTION TO WITHDRAW AS COUNSEL FOR APPELLANT

Pursuant to SCRAP, Rule 264 (b) and 240, comes now the law firm of Wills Massalon & Allen LLC and its attorney, John A. Massalon, requesting to be allowed to withdraw as attorneys of record in the above-captioned matter and to be relieved of any further obligation to represent Appellant in this case. Appellant consents to the undersigned being relieved as counsel. The basis for this Motion is that Appellant wishes to proceed Pro Se.

Therefore, for justifiable cause shown, the undersigned requests that the court

order that the law firm of Wills Massalon & Allen LLC and John A. Massalon are permitted to withdraw as counsel and be relieved of any further obligation to appear in this case. Further, the undersigned requests that the Appellant's deadline to file her Initial Brief be extended for thirty (30) days to permit the Appellant an opportunity to retain substitute counsel if necessary. The undersigned has consulted with all parties, and there is no objection to this motion.



John A. Massalon
WILLS MASSALON & ALLEN LLC
Post Office Box 859
Charleston, South Carolina 29402
(843) 727-1144
ATTORNEY FOR APPELLANT

December 15, 2014

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

James E. Chellis, Master in Equity

Case No. 2013-CP-18-183 consolidated with
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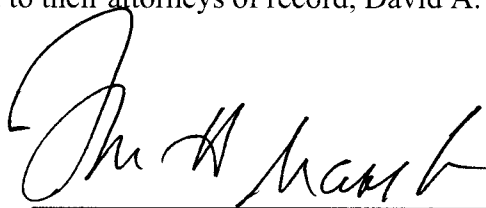
Thomas Ferro, Lorraine Ferro,
Stephen Dudek, and Doreen Cross,

Respondents.

PROOF OF SERVICE

I certify that I served the Motion to Withdraw as Counsel for Appellant (SCRAP 264(b) and 240) on Respondents Thomas and Lorraine Ferro by depositing a copy of it in the United States Mail, postage prepaid, on December 15, 2014 and addressed to 5501 Carson St, Denver, Colorado 80239. Further, I certify that I served the Motion to Withdraw as Counsel for Appellant (SCRAP 264(b) and 240) on Respondents Stephen Dudek, and Doreen Cross by depositing a copy of it in the United States Mail, postage prepaid, on December 15, 2014, addressed to their attorneys of record, David A. Collins, P.O. Box 40578, Charleston, SC 29423.

December 15, 2014



John A. Massalon, Esquire
Wills Massalon & Allen LLC
97 Broad Street
P.O. Box 859
Charleston, SC 29402
843-727-1144
Attorneys for Appellant

WMA

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December 15, 2014

Direct Dial: (843) 793-6039

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

RE: Molly M. Morphew v. Thomas Ferro, Lorraine Ferro,
Stephen Dudek, and Doreen Cross
Case No.: 2013-CP-18-0183 & 2013-CP-18-74
Our File No.: 868-1

Dear Ms. Kitchings:

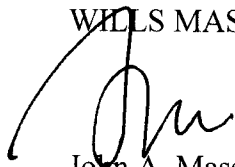
Enclosed please find the original and seven (7) copies of a Motion to Withdraw as Counsel for Appellant and Proof of Service in regard to the above-referenced matter. In addition, please find Wills Massalon & Allen LLC's check in the amount of \$25.00 representing the filing fee.

Please file the original and copies, returning a filed copy to me in the self-addressed, stamped envelope provided. If you have any questions, please do not hesitate to contact me.

With kind regards, I am

Sincerely,

WILLS MASSALON & ALLEN LLC



John A. Massalon
jmassalon@wmalawfirm.net

JAM/cb
Enclosures

cc: David A. Collins, Esquire
Mr. Thomas Ferro/Ms. Lorraine Ferro, *Pro Se*
Ms. Molly M. Morphew

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Clerk

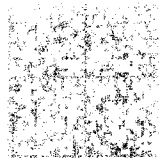


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SC Court of Appeals



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The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

