

STATE OF SOUTH CAROLINA)
)

IN THE APPELLATE COURT
CASE NUMBER: 2014-002580

74968

IN THE MATTER OF:)
)

Clyde Morris, Respondent,)
)

v.)
)

**MOTION TO BE RELIEVED
AS COUNSEL**

Joseph V. Johnson, III, Joseph V.)
Johnson, Sr., Mildred R. Johnson,)
Joseph V. Johnson, Jr., William)
Johnson, and Allen R. Barnette,)
Defendants,)
)

Of Whom Joseph V. Johnson, Sr.,)
and Joseph V. Johnson Jr., are the)
Appellants.)
)
)

Chris J. Loudon, attorney of record for the Respondent moves before this Honorable Court for an order relieving him as counsel. The motion is based upon the following:

1. Chris J. Loudon acted as trial counsel for the Respondent.
2. The representation agreement between Chris J. Loudon and the Respondent specifically excluded representing the Respondent in any appeal before the South Carolina Court of Appeals or the South Carolina Supreme Court unless a separate and subsequent representation agreement was entered into by the Respondent.

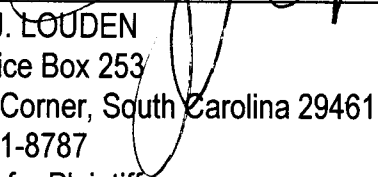
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FEB 06 2015

SC Court of Appeals

3. The Respondent has failed to enter into a subsequent representation agreement for the pending appeal.

Based upon the above Chris J. Loudon moves the Court for an order relieving him as counsel for the Respondent.



CHRIS J. LOUDON
Post Office Box 253
Moncks Corner, South Carolina 29461
(843) 761-8787
Attorney for Plaintiff

February 2, 2015
Moncks Corner, South Carolina

STATE OF SOUTH CAROLINA)

IN THE APPELLATE COURT
CASE NUMBER: 2014-002580

IN THE MATTER OF:)

Clyde Morris, Respondent,)

CERTIFICATE OF MAILING
MOTION TO BE RECEIVED
AS COUNSEL

v.)

Joseph V. Johnson, III, Joseph V.)

Johnson, Sr., Mildred R. Johnson,)

Joseph V. Johnson, Jr., William)

Johnson, and Allen R. Barnette,)

Defendants,)

Of Whom Joseph V. Johnson, Sr.,)

and Joseph V. Johnson Jr., are the)

Appellants.)

)

)

I, Lila Wrenn Lynes, Legal Assistant to Chris J. Loudon, Esquire, do hereby certify that a copy of the MOTION TO RELIEVE COUNSEL being filed simultaneously herein in the above captioned matter was mailed to all parties in the foregoing matter at the addresses below indicated via the United States Postal Service, postage prepaid, on the 4th day of February, 2015, as follows:

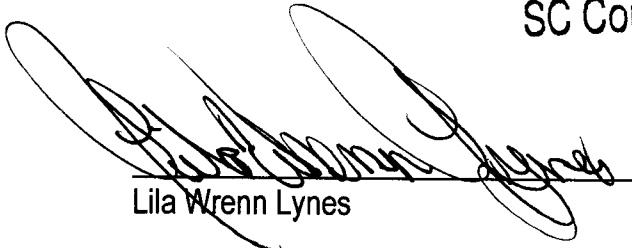
Mr. Clyde Morris
156 Doodle Hill Lane
St. Stephen, South Carolina 29479

Willie B. Heyward, Esquire
The Heirs Property Law Center
27 Gamecock Avenue – Suite 200
Charleston, South Carolina 29407

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SC Court of Appeals



Lila Wrenn Lynes

Dated: 4th Feb, 2015
Moncks Corner, South Carolina

Morris v. Johnson, et al.
Appellate Court Case: 2014-00-2580
CERTIFICATE OF MAILING – MOTION TO BE RELIEVED AS COUNSEL
Chris J. Loudon, Esquire
February 2015
Page 2 of 2

Chris J. Louden

ATTORNEY AT LAW, P.C.

223-A Heatley Street
Post Office Box 253
Moncks Corner, South Carolina 29461

February 3, 2015

Telephone
843 / 761-8787
Toll Free
1-866-761-6813
Fax 843 / 761-8771

The Honorable Jenny Abbott Kitchings
Appellate Clerk of Court
Post Office Box 11629
Columbia, South Carolina 29211

Re: Clyde Morris v. Joseph V. Johnson, Sr. and Joseph V. Johnson, Jr.
Appellate Court Case Number: 2014-002580

Dear Madame Clerk:

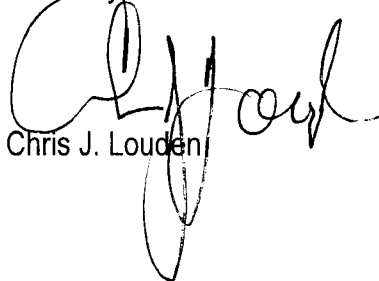
I have enclosed for filing in the above referenced case the **original** and 1 copy of my *Motion To Be Relieved As Counsel and Certificate of Mailing*. I have also enclosed my check in the amount of \$25.00 as the motion fee, together with a self-addressed stamped envelope for the return of filed documents.

I have by copy of this letter and attachments served my motion on the Respondent and attorney for the Appellants.

Thank you for your attention to this matter and please contact me with any questions.

With kindest regards, I remain,

Sincerely,


Chris J. Louden

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FEB 06 2015

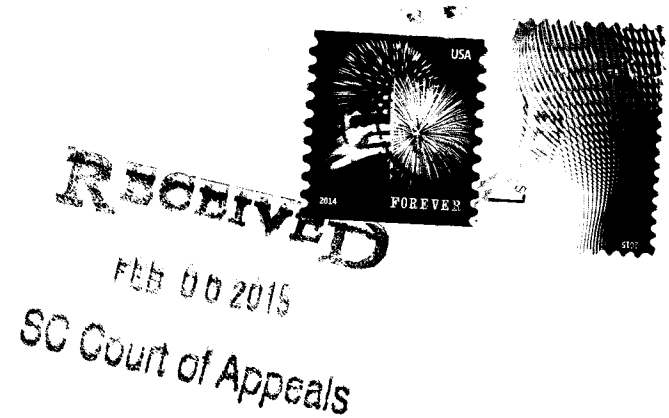
SC Court of Appeals

CJL/lwl
Enclosure as stated
cc: Clyde Morris
Willie B. Heyward, Esq.
File number: 2011-05-227

Chris J. Loudon

ATTORNEY AT LAW, P.C.

223-A Heatley Street
Post Office Box 253
Columbia, South Carolina 29461



The Honorable Jenny Abbott Kitchings
Appellate Clerk of Court
Post Office Box 11629
Columbia, South Carolina 29211

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