

STATE OF SOUTH CAROLINA
In the Court of Appeals

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FEB 24 2015

SC Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

Robert E. Watson. – Master-in-Equity

APPELLATE CASE NUMBER 2014-002580

Clyde Morris.....Respondent,

v.

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

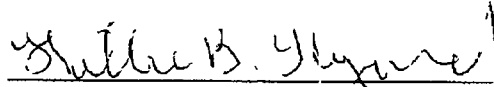
of whom Joseph V. Johnson, Sr..... Appellant

REPLY TO RESPONDENT COUNSEL’S MOTION TO BE RELIVED AS
COUNSEL

1. Willie B. Heyward, counsel for the Appellant does not object to counsel for the Respondent’s Motion to be relieved as counsel in this matter.
2. Appellants’ counsel does not have the contact information for the Respondent if Respondent is proceeding Pro Se or the contact information for substituted counsel for the Respondent if Respondent has retained other counsel.
3. Appellants’ counsel also asks that he be notified of the Respondent’s intent to retain other counsel in a timely manner.

Respectfully submitted,

Morris v. Johnson
Reply to Motion to be Relived
January 2015



Willie B. Heyward
Heirs' Property Law Center, LLC
27 Gamecock Ave., Suite 200
Charleston, SC 29407
(843) 225-8754
Attorney for Appellant

Christopher J. Louden
Office of Chris J. Louden
PO Box 253
Moncks Corner, SC 29461
Attorney for Respondent

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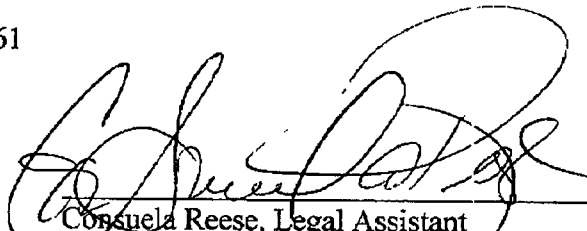
Joseph V. Johnson, III, Joseph V. Johnson, Sr., Mildred R. Johnson, Joseph V. Johnson, Jr., William Johnson and Allen R. Barnette, Defendants Defendants,

of whom Joseph V. Johnson, Sr..... Appellant

PROOF OF SERVICE

I certify that I have served a copy **Reply to Respondent Counsel's Motion to be Relived as Counsel** all counsel of record by depositing copies of the same in the United States Mail postage prepaid, on February 24, 2015 addressed as follows:

Christopher J. Loudon
Office of Chris J. Loudon
PO Box 253
Moncks Corner, SC 29461


Consuela Reese, Legal Assistant
Heirs Property Law Center, LLC

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FEB 24 2015
SC Court of Appeals

**Heirs Property
Law Center, LLC**

27 Gamecock Ave Suite 200
Charleston, SC 29407

February 24, 2015

South Carolina Court of Appeals
1015 Sumter St.
PO Box 11629
Columbia, SC 29211

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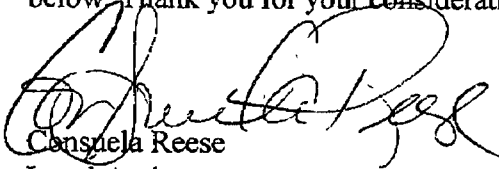
SC Court of Appeals

**Re: Clyde Morris vs. Joseph V. Johnson, et al.
Case No.: 2012-CP-08-00284
Appellant Case No.: 2014-002580**

Dear Sir / Madam:

Enclosed please find the original and a copy of the **Reply to Respondent Counsel's Motion to be Relived as Counsel and Certificate of Service** in the above-referenced matter. Please file same and return the clocked copy to me in the self-addressed, stamped envelope provided herein.

By copy of this letter, I am serving Plaintiff's attorney with a copy of the **Reply to Respondent Counsel's Motion to be Relived as Counsel and Certificate of Service** as stated below. Thank you for your consideration in this matter.



Consuela Reese
Legal Assistant to
Willie B. Heyward
Attorney for Joe Johnson

cc: Chris J. Loudon
Office of Chris J. Loudon
PO Box 253
Moncks Corner, SC 29461
Attorney for Respondent

THE HEIRS PROPERTY LAW CENTER, LLC

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FAX COVER SHEET

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SC Court of Appeals

To: *The SC Court of Appeals*
From: *Clerk of Court.*
Atty w B Heyward

YOUR FAX NO: *803. 734. 1839*
YOUR PHONE NO: *803 734-1890*

NO. OF PAGES: *4 + Cover*

Re: *Clyde Morris v. Joseph Johnson, et al*
Appellant Case # 2014-002580

Original to Be Mailed

OUR FAX NO.: (843) 225-8765

OUR PHONE NO: (843)-225-8754

REPLY TO: Consuela Reese

DATE

TIME:

THANK YOU!

THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE IS ATTORNEY/CLIENT PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPY OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE.