

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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FEB 26 2015

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APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

**SC Court of Appeals**

Robert E. Watson. – Master-in-Equity

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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

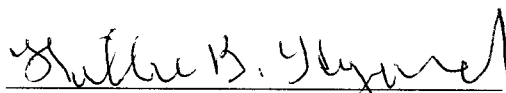
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REPLY TO RESPONDENT COUNSEL’S MOTION TO BE RELIVED AS  
COUNSEL

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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,



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

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

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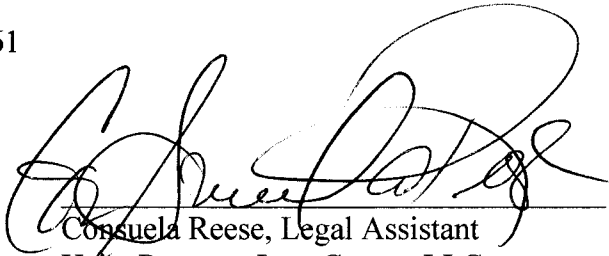
Joseph V. Johnson, III, Joseph V. Johnson, Sr., Mildred R. Johnson, Joseph V. Johnson, Jr., William Johnson and Allen R. Barnette, Defendants Defendants,

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

  
Consuela Reese, Legal Assistant  
Hirs Property Law Center, LLC

Heirs Property  
Law Center, LLC



27 Gamecock Ave., Suite 200  
Charleston, SC 29407

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**SC Court of Appeals**

February 24, 2015

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

**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.

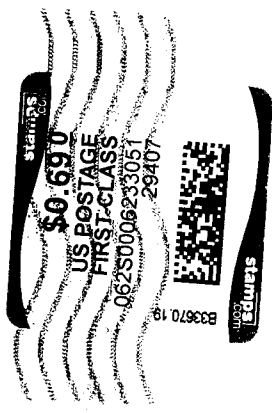
By copy of this letter, I am serving Plaintiff's attorney with a copy of the **Reply to Respondent Counsel's Motion to be Relived as Counsel and Certificate of Service** as stated below. Thank you for your consideration in this matter.

Constela 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  
27 Gamecock Avenue  
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CHARLESTON SC 29404  
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*The South Carolina Court of Appeals*  
*PO Box 11629*  
*Columbia, SC 29211*

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**SC Court of Appeals**

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