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STATE OF SOUTH CAROLINA
COURT OF APPEALS

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APR 20 2015
SC Court of Appeals

Case No. 2013-000525

Mary L. Dinkins Higher Learning Academy (MLD).....Appellant,

V.

South Carolina Public Charter School District (SCPCSD).....Respondent.

NOTICE OF MOTION AND MOTION TO BE RELIEVED
AS COUNSEL FOR THE APPELLANT

Johnny E. Watson, Sr., Esquire

Karl S. Bowers, Jr., Esquire

Watson Law Firm
2715 Edgewood Avenue
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Rice, LLP
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(803) 454-6504

Counsel for Appellant

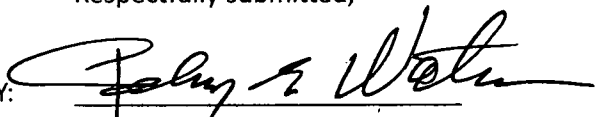
Counsel for Respondent

STATEMENT OF MOTION

PLEASE TAKE NOTICE that the attorney for the above-named Appellant, will move before the Presiding Judge of the South Carolina Court of Appeals, State of South Carolina, immediately, or as soon as this matter may be heard, for an Order relieving him as counsel for the Appellant based on the statutory and common laws of this state, the Rules of Appellate procedure and the following facts:

- A. The Mary L. Dinkins Higher Learning Academy (MLD) is a charter school whose charter was revoked by the Respondent and that decision was upheld by the Honorable Shirley C. Chisolm of the South Carolina Administrative Law Court in its decision dated March 1, 2013,
- B. The Appellant timely filed its Notice of Appeal on March 14, 2013,
- C. The attorney for the Appellant, below signed, received the attached letter terminating his representation of the Appellant.
- D. The attorney for the Appellant wish to comply with the wishes of the Appellant that he no longer represent the Appellant and respectfully request to be relieved as attorney for the Appellant.
- E. The Respondent is not prejudiced by the granting of this request and has requested that the appeal be based on the record without oral arguments.

Respectfully submitted,

BY: 

Johnny E. Watson, Sr.
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Columbia, South Carolina
Dated: April 20, 2015

MLD Higher Learning Academy

124 Gregg Street Bishopville, SC 29010

(803) 459--3163

April 7,2015

Dear Mr. Watson

2013-000525 Mary L. Dinkins Higher Learning v. SC Public Charter School District

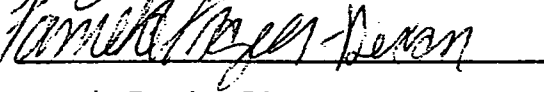
We, MLD Higher Learning Academy Board of Directors, thank you for all of your previous assistance. However, we were totally unaware that we were scheduled for court next week. The board has no idea of what is going on and therefore we are relieving you of your services and duties regarding this appeal. Again, thank you!



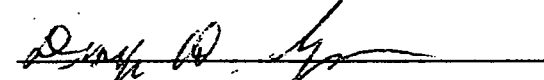
George Williams, Board Chair



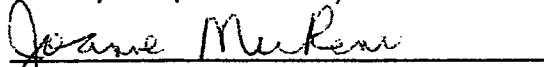
Elijah Dinkins, Vice Chair



Pamela Frazier-Dixon



Dewayne Spann



Joanne Mickens, Secretary

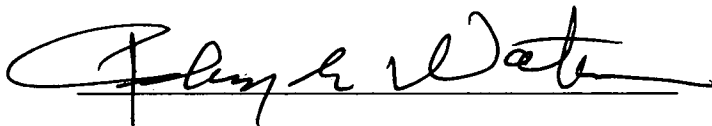
CERTIFICATE OF SERVICE

I, Johnny E Watson, Attorney for the Mary L. Dinkins Higher Learning Academy (MLD), hereby certify that I have served the individual named below with a copy of the document described herein by depositing it in the U. S. Mail, postage prepaid, to the person named at the address listed herein below or by delivering said document by hand to the address below:

PERSON SERVED: Butch Bowers
 Attorney for the SCPCSD
 1727 Hampton Street
 Columbia, South Carolina 29201

DOCUMENT SERVED: **NOTICE OF MOTION AND MOTION TO BE RELIEVED AS
 COUNSEL FOR THE APPELLANT.**

DATE SERVED: April 20, 2015



Johnny E. Watson, Document Server

Columbia, South Carolina
Date: April 20, 2015

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