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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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JUN 10 2015
SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

Case No. 2014-002661

John M. English,

Appellant,

v.

Ellen Sexton,

Respondent.

MOTION TO BE NAMED AS A
RESPONDENT IN THIS APPEAL

John E. White, Jr.

5305 Sumters Run

North Charleston, South Carolina 29418

(843) 327-0850


Attorney for Appellant

TO: DAVID A. COLLINS, ESQUIRE
G. THOMAS HILL, ESQUIRE
KAREN M. DEJONG, ESQUIRE

PLEASE TAKE NOTICE that, on the 10th day hereafter or at such other time as the Court may direct, or, in the alternative, without a hearing if this Court should find that no hearing shall be required, Respondent John Evander White, Jr. shall move before this Court and does hereby move before this Court pursuant to Rule 264, South Carolina Rules of Appellate Procedure, for an order of this Court naming Movant as a Respondent in this appeal.

The grounds for this motion are that (a) the Appellant no longer requires Appellant's services as counsel; (b) Appellant has other counsel to represent him now; and, (c) in the appeal before this Court, Appellant has made his interests and Movant's interests unavoidably adverse to each other by appealing the Lower Court's order for appellant to pay Movant's attorney's fees; and, (d) Appellant has appealed the Lower Court's order to pay Movant's attorney's fees and Movant must respond to such appeal.

June 8, 2015



John Evander White, Jr.

5305 Sumters Run

North Charleston, South Carolina 29418

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APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

Case No. 2014-002661

Case Number 2010-CP-10-7241

John M. English,

Appellant

v.

Ellen Sexton,

Respondent.

PROOF OF SERVICE

I certify that I served the Respondent's Motion to Be Named as a Respondent in This Appeal and Memorandum in Support of Motion to Be Named as a Respondent in This Appeal upon Appellant and all other counsel of record by depositing a copy thereof in the United States mail, postage prepaid, on June 8, 2015, addressed as follows:

David A. Collins, Esquire

G. Thomas Hill, Esquire

Post Office Box 40978

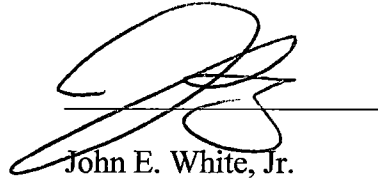
6209 Savannah Highway

North Charleston, SC 29423

Ravenel, SC 29470

Karen M. DeJong, Esquire
940 Johnnie Dodds Blvd., Ste 203
Mt. Pleasant, SC 29464

June 8, 2015



John E. White, Jr.

5305 Sumters Run
North Charleston, South Carolina 29418
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THE WHITE LAW FIRM, LLC

5305 Sumters Run
North Charleston, South Carolina 29418
Phone (843) 327-0850 / e-Fax (864) 751-4197
Email: vanwhitelaw@live.com

June 8, 2015

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1013 Sumter Street
Columbia, South Carolina 29201

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SC Court of Appeals

RE: John M. English v. Ellen Sexton
Case No. 2014-002661
Lower Court Case No. 2010-CP-10-7241

Dear Ms. Kitchings:

Please find enclosed herewith my check for the motion filing fee and the original and 7 copies of the following:

1. Motion to Be Named as a Respondent in This Appeal;
2. Memorandum in Support of Motion to Be Named as a Respondent in this Appeal; and,
3. Proof of Service

Please file the original and 6 copies of each and please return one copy to me in the self-addressed, stamped envelope provided. Should you have any questions or concerns, please do not hesitate to contact me.

Thank you.

Sincerely,



John E. White, Jr.

cc: David A. Collins, Esq.
G. Thomas Hill, Esq.
Karen M. DeJong, Esq.



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The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1013 Sumter Street
Columbia, South Carolina 29201

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