

76241

RECEIVED

JUN 09 2015

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas
Case No. 2014-CP-46-2643

John C. Hayes, III, Circuit Court Judge

Appellate Case No. 2014-002286

The City of Rock Hill,

Appellant,

v.

James Delaney Allen, III,

Respondent.

CONSENT MOTION FOR RELIEVING ATTORNEY FOR RESPONDENT

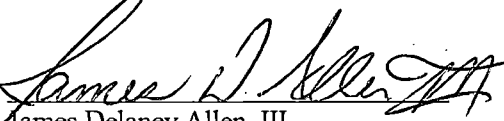
Michael L. Brown, Jr., attorney for Respondent, James Allen, moves this Court to be relieved as counsel of record for Respondent, James Delaney Allen, III, for the following good cause:

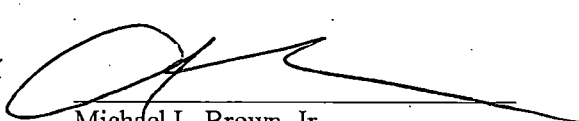
1. Respondent hired with Michael L. Brown, Jr. to represent him in the above-captioned matter by signing a fee agreement on March 16, 2015.
2. Respondent has failed substantially to meet his obligation to Mr. Brown under the fee agreement and client has been given reasonable warning as to Mr. Brown's intention to withdraw.
3. Mr. Brown cannot continue representation of Respondent without unreasonable financial burden.
4. Withdrawal will not prejudice the opposing party's case.
5. As evidenced by his signature, Respondent James Delaney Allen, III consents.

WHEREFORE Michael L. Brown, Jr. seeks an Order of this Court relieving him as counsel for Respondent and granting an extension of time so that Respondent may find substitute counsel.

I SO CONSENT:

I SO CONSENT:


James Delaney Allen, III
Respondent


Michael L. Brown, Jr.
Law Offices of Michael L. Brown, Jr.
Post Office Box 1025
Rock Hill, SC 29731
(803) 328-8822
Attorney for Respondent


May 20, 2015

The Law Offices of Michael L. Brown, Jr.

223 Main Street
One Law Place, Suite 550
Post Office Box 1025
Rock Hill, SC 29731

CHARLOTTE
NC 282
05 JUN '15
FM 2 L



UNITED STATES POSTAGE

PITNEY BOWES
\$ 000.69⁰
02 1P
0004433489 JUN 05 2015
MAILED FROM ZIP CODE 29730

SC Court of Appeals
Clerk of Court
1220 Senate Street
Columbia, South Carolina 29201

RECEIVED

JUN 09 2015

SC Court of Appeals

29201372320

