

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM THE JASPER COUNTY  
Court of Common Pleas

Darrell Thomas Johnson, Special Referee

Appellate Case No.: 2015-002567

78541

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JAN 20 2016

SC Court of Appeals

William Davis, Jr.,

Appellant

v.

Dorothy Davis,

Respondent.

NOTICE OF MOTION AND MOTION TO BE RELIEVED  
AS COUNSEL OF RECORD

PLEASE TAKE NOTICE that H. Fred Kuhn, Jr., Esquire, attorney for William Scott Davis, Jr. hereby moves for an Order allowing H. Fred Kuhn, Jr., Esquire and the law firm of Moss, Kuhn & Fleming, P.A. to withdraw as Guardian *ad Litem* and attorney for William Scott Davis, Jr. This motion will be based on the fact that the undersigned was appointed by the Beaufort County Probate Court to serve as Guardian ad Litem for the Appellant William Scott Davis, who was incarcerated out of State, in proceedings before the Probate Court pursuant to S.C. Code Ann. §62-7-305(2014) and Rule 17(d)(4), SCRCF. The movant is informed and believes that the appointment does not carry over to appellate proceedings. Additionally, communications have broken down and the undersigned cannot read or understand communications from the Appellant because they are illegible.

MOSS, KUHN & FLEMING, P.A.

By: \_\_\_\_\_

H. Fred Kuhn, Jr.  
1501 North Street  
Post Office Drawer 507  
Beaufort, South Carolina 29901  
(843)524-3373  
(843)524-1302 (FX)

Beaufort, South Carolina  
January 25, 2016

CERTIFICATE OF SERVICE

Undersigned certifies that the **Notice of Motion and Motion to be Relieved as Counsel of Record**, to which this certificate is affixed, was served upon the party (s) to this action by hand delivery or by depositing a copy of same, enclosed in a first class, postpaid wrapper properly addressed to the attorney(s) of record:

The Honorable Kenneth E. Fulp, Jr.  
Beaufort County Probate Court  
102 Ribaut Road  
Beaufort, Carolina 29902

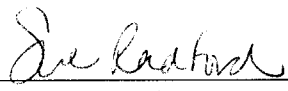
Stephen E. Carter, Esquire  
Carter Law Firm  
100 WatersEdge  
Hilton Head Island, SC 29928

William Scott Davis  
Federal Medical Center  
3301 Leestown Road  
Lexington, Kentucky 40511

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in a post office or official depository under the exclusive care and custody of the United States Postal Service, on January 26, 2016.

MOSS, KUHN & FLEMING, P.A.

By:   
Sue Radford  
Post Office Drawer 507  
Beaufort, South Carolina 29901  
843-524-3373 / Fax: 843-524-1302

LAW OFFICES

MOSS, KUHN & FLEMING, P.A.

JAMES H. MOSS  
H. FRED KUHN, JR.  
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TELEPHONE 843-524-3373  
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KIMBERLY L. SMITH

\*ALSO MEMBER OF GA BAR

January 26, 2016

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: William Davis, Jr. v. Dorothy Davis  
Appellate Case No.: 2015-002567

Dear Mrs. Kitchings:

Enclosed please find the original and seven (7) copies of the Notice of Motion and Motion to be Relieved as Counsel of Record in the above-referenced matter. I would appreciate it if you would return a filed copy to me in the enclosed self-addressed stamped envelope. Also enclosed is my firm's check in the amount of \$25.00 for the filing of the same.

With kindest regards, I am

Very truly yours,

MOSS, KUHN & FLEMING, P.A.

  
H. Fred Kuhn, Jr.

HFK:sr  
Enclosures

cc: The Honorable Kenneth E. Fulp, Jr. (w/enclosure)  
Stephen E. Carter, Esquire (w/enclosure)  
William Davis, Jr. (w/enclosure)

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**MOSS, KUHN & FLEMING, P.A.**

ATTORNEYS AT LAW

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*HK*

*um Davis*

To:

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

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