

State of South Carolina

In The Court of Appeal

H. Thad White, Respondent

V.

Petrel International, LLC and

Haiyan Lin, Appellants

Appellate Case No. 2014-002764

Motion For Hearing and Oral Argument

on
Notice of Motion To Be Relieved As Counsel of Record

In receiving the Notice of Motion To Be Relieved As Counsel of Record on April 18, 2016, and also the court order granting such motion, dated April 15, 2016, on April 23, 2016, the appellant, Haiyan Lin, for herself as individual, and also represent her own LLC, Petrel International, LLC, here by contests that she has never agreed or gave consent for Mr. Carter to be relieved as counsel of record. The claim that "I so move on behalf of the Appellant and Counsel of Record" is false. The appellants also object that the court has granted the motion without giving the appellant an opportunity to speak for herself on her own and her company's behalf.

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As matter of the right under 14th amend-
ment of US Constitution and SC Code Ann
§14-3-330, the appellants here by request
this court schedule a motion hearing for
oral arguments on both the appellants and
the Counsel of Record. To prevent prejudice
against the appellants, to protect due process
rights of the appellants, to guarantee her equal
protection under the law, it is imperative
that the appellants are afforded with such
motion hearing, as matter of "substantial
right" protected by SC Code Ann §14-3-330
(Supp. 2011) and 14th amendment of US Consti-
tution.

Before the Counsel of Record can be relieved,
the court shall first address the following
issues:

1. What is client's Bill of Right under an attorney and client relationship?
2. Whether the counsel of record has fully complied with the strict standards of professional responsibility, setting forth in codes of conducts, privileges, and ethics by American Bar Associations?

3. whether the counsel's deficiency performance on his fiduciary duties in communicating and representing the appellant is due to his collusion with the opposing counsel and special Referee?

4. whether granting the counsel to be relieved as counsel of record at the last stage of the appeal creates harm, prejudice, and essentially undermine the "substantial right of the appellant?"

5. whether the appellant entitle a full refund of the retainer fee, since his withdraw caused the case be dismissed, without retaining another attorney, which is economically and practically impossible at the last stage of the appeal?

The appellant will provide facts, evidences, and laws to affirm these issues.

April 28, 2016

Haiyan Lin
P.O. BOX 8776
Columbia, SC 29202

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Certificate of Service

I certify that I have served a copy of Motion For Hearing and Oral Argument to the following parties to:

Eleazer R. Caster
105 S. Brooks St.
Post Office Box 187
Manning, SC 29102

Bryan W. Braddock
2231 W. Palmetto St.
Florence, SC 29501

by us mail on April 28, 2016.

April 28, 2016

Haiyan Lin
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