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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
COURT OF COMMON PLEAS

Joseph M. Strickland, Master-in-Equity

Case No. 2006-CP-40-03713

RECEIVED

JUL 27 2016

SC Court of Appeals

LongCreek Plantation Property Owners'  
Association, Inc. and Fairways Development General  
Partnership .....Respondent

v.

Charles Marshall.....Appellant

**MOTION TO RELIEVE COUNSEL AS ATTORNEY FOR AND FROM  
REPRESENTATION OF APPELLANT CHARLES MARSHALL  
AND MEMORANDUM**

Pursuant to Rules 240 and 264, SCRAP the undersigned hereby move the Court to  
relieve Susan Batten Lipscomb, and Lipscomb Law Firm, P.A. as counsel for Appellant  
Charles Marshall in this matter, and all other matters, and, to stay the time limits for  
perfecting the Appeal until this motion is decided.

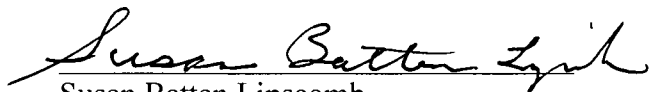
The grounds for this Motion to Relieve are as follows. The undersigned counsel  
filed the Notice of Appeal on behalf of and at the request of Appellant to protect the  
jurisdiction of the Court to hear his Appeal. Counsel for Appellant was engaged to  
defend the Complaint, assert applicable Counterclaims, prepare and try the case in the  
lower court. Although Appellant received a verdict in favor of Appellant as to the  
Complaint, Appellant's Counterclaims were denied and that is the subject of the appeal.  
Perfecting an appeal is outside the scope of the matters counsel and Appellant agreed  
would be handled by this counsel. Withdrawal can be accomplished without material

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adverse effect on the interests of the Appellant. Furthermore, the representation of Appellant in this appeal will result in an unreasonable financial burden on counsel. Counsel has advised Appellant that counsel will move to withdraw from representation in this appeal and request the Court to allow him reasonable time to employ other counsel to perfect the Appeal. Appellant has voiced no objection.

Susan Batten Lipscomb, and Lipscomb Law Firm, P.A. hereby petition and move the Court for an Order relieving them as counsel for Appellant Charles Marshall in this matter and for an Order allowing Appellant reasonable time to employ other counsel to represent him in this matter.

Respectfully submitted,



Susan Batten Lipscomb  
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*Attorney for Appellant*

July 27, 2016

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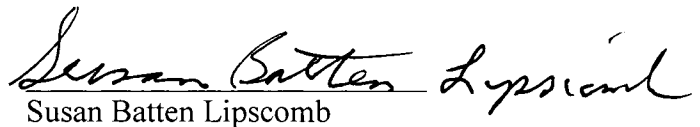
PROOF OF SERVICE

I, Susan Batten Lipscomb, attorney for Appellant, do hereby certify that on July 27, 2016, the **Motion to Relieve Counsel as Attorney for and from Representation of Charles Marshall** was served on counsel of record and by mailing a copy of the same to them by United States Mail, postage prepaid, addressed as set forth below:

Eugene C. Fulton, Jr., Esq.  
1492-A Lake Murray Blvd.  
Columbia, SC 29212

Alfred Johnston Cox, Esq.  
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Susan Batten Lipscomb

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# LIPSCOMB LAW FIRM, PA

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Charleston, SC 29401  
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July 26, 2016

The Honorable Jenny Abbott Kitchings  
Clerk, S.C. Court of Appeals  
1015 Sumter Street  
P.O. Box 11629  
Columbia, SC 29211

RECEIVED  
JUL 27 2016  
SC Court of Appeals

Re: LongCreek Plantation Property Owners' Association, Inc. and Fairways Development  
General Partnership v. Charles Marshall,  
Civil Action #: 2006-CP-40-03713

Dear Ms. Kitchings:

Enclosed for filing is an original Motion to Relieve Counsel and Memorandum and six copies in the above referenced case. Also enclosed is a check for \$25.00 for the filing fee.

By copy of this letter, we are serving counsel of record a copy of the documents sent for filing.

Thank you for your assistance in this matter.

Yours very truly,



Susan Batten Lipscomb

Enclosures

cc: Eugene Charles Fulton, Jr., Esquire  
Alfred Johnston Cox, Esquire  
D. Ryan McCabe, Jr., Esquire