

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**  
AUG 16 2016  
SC Court of Appeals

APPEAL FROM SUMTER COUNTY  
Court of Common Pleas

The Honorable Michael G. Nettles, Circuit Court Judge

Case No. 2016-001526

The Bank of New York Mellon f/k/a The Bank of New York, as Trustee for the benefit of Certificateholders of Popular ABS, Inc. Mortgage Pass-Through Certificates Series 2006-E,.....

Respondent,

v.

Charles Taylor, Burgess Brogdon Bldg. Supply,  
Palmetto Health Alliance,.....

of Whom Charles Taylor is the

Appellant.

**RESPONDENT’S MOTION TO ALLOW ALANA O. WILLIAMS TO  
WITHDRAW AS COUNSEL OF RECORD**

Pursuant to Rule 264(b) of the South Carolina Appellate Court Rules, Respondent The Bank of New York Mellon f/k/a The Bank of New York, as Trustee for the benefit of Certificateholders of Popular ABS, Inc. Mortgage Pass-Through Certificates Series 2006-E (“Respondent”) files this Motion to allow Alana O. Williams to Withdraw as Counsel of Record. The basis for this motion is that Alana O. Williams no longer represents Respondent in this appeal.

Ms. Williams recently resigned from Nelson, Mullins, Riley & Scarborough, LLP (“Nelson Mullins”). Respondent has been represented from the outset of this appeal by B. Rush Smith III

and Sarah B. Nielsen of Nelson Mullins. Mr. Smith and Ms. Nielsen will continue representation of Respondent. The withdrawal of Ms. Williams will not impact representation of Respondent, prejudice Appellant in any manner, or delay this appeal.

The change of employment by Ms. Williams constitutes justifiable cause to allow withdrawal as counsel for Respondent, especially in light of the fact that Mr. Smith and Ms. Nielsen continue to represent Respondent in this action. Thus, Respondent requests that Alana O. Williams be allowed to withdraw from representation of it, and that she be removed from all notices, letters, and other communications in this appeal.

Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 

B. Rush Smith III  
SC Bar No. 012941  
E-Mail: rush.smith@nelsonmullins.com  
Sarah B. Nielsen  
SC Bar No. 78384  
E-Mail: sarah.nielsen@nelsonmullins.com  
1320 Main Street / 17th Floor  
Post Office Box 11070 (29211-1070)  
Columbia, SC 29201  
(803) 799-2000

Attorneys for The Bank of New York Mellon f/k/a The Bank of New York, as Trustee for the benefit of Certificateholders of Popular ABS, Inc. Mortgage Pass-Through Certificates Series 2006-E

Columbia, South Carolina

8/16, 2016

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

RECEIVED

AUG 16 2016

SC Court of Appeals

---

APPEAL FROM SUMTER COUNTY  
Court of Common Pleas

The Honorable Michael G. Nettles, Circuit Court Judge

Case No. 2016-001526

---

The Bank of New York Mellon f/k/a The Bank of New  
York, as Trustee for the benefit of Certificateholders of  
Popular ABS, Inc. Mortgage Pass-Through Certificates  
Series 2006-E, ..... Respondent,

v.

Charles Taylor, Burgess Brogdon Bldg. Supply, Palmetto  
Health Alliance

of Whom Charles Taylor is the..... Appellant

---

PROOF OF SERVICE

---

I certify that I have served a copy of Respondent's Motion to Allow Alana O. Williams to Withdraw as Counsel of Record by United States Mail, prepaid, on August 16, 2016, addressed to:

Charles Taylor, *pro se*  
334 Myrtle Beach Highway  
Sumter, SC 29153

S. Nelson Weston, Jr., Esq.  
Richardson Plowden & Robinson  
P.O. Drawer 7788  
Columbia, SC 29202

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 

B. Rush Smith III

SC Bar No. 012941

E-Mail: [rush.smith@nelsonmullins.com](mailto:rush.smith@nelsonmullins.com)

Sarah B. Nielsen

SC Bar No. 78384

E-Mail: [sarah.nielsen@nelsonmullins.com](mailto:sarah.nielsen@nelsonmullins.com)

1320 Main Street / 17th Floor

Post Office Box 11070 (29211-1070)

Columbia, SC 29201

(803) 799-2000

Attorneys for The Bank of New York Mellon f/k/a The Bank  
of New York, as Trustee for the benefit of Certificateholders  
of Popular ABS, Inc. Mortgage Pass-Through Certificates  
Series 2006-E

Columbia, South Carolina

8/16, 2016

# Nelson Mullins

Nelson Mullins Riley & Scarborough LLP  
Attorneys and Counselors at Law  
1320 Main Street / 17th Floor / Columbia, SC 29201  
Tel: 803.799.2000 Fax: 803.255.5943  
www.nelsonmullins.com

Sarah B. Nielsen  
Tel: 803.255.9284  
Fax: 803.255.5943  
sarah.nielsen@nelsonmullins.com

August 16, 2016

## Hand Delivered

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Sumter Street  
Columbia, SC 29201

RECEIVED  
AUG 16 2016  
SC Court of Appeals

Re: Bank of NY Mellon v. Charles Taylor, et al.  
Case No. 2016-001526  
Our File No. 36266/01512

Dear Ms. Kitchings:

Enclosed please find an original and seven copies of Respondent's Motion to Allow Alana O. Williams to Withdraw as Counsel of Record in the above-referenced matter. We would appreciate your filing the original and returning a clocked copy to us via our courier.

By copy of this letter, we are hereby serving a copy of same on *pro se* Appellant and counsel.

Thank you for your attention to this matter. If you have any questions, please do not hesitate to contact us.

Very truly yours,

  
Sarah B. Nielsen

SBN:cr  
Enclosures

cc: Charles Taylor, *pro se*  
S. Nelson Weston, Jr., Esq.