

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

The Honorable Joe M. Crosby, Master-in-Equity

Case No. 2011-CP-22-00180

Appellate Case No. 2013-001447

RECEIVED
AUG 25 2016
SC Court of Appeals

Kennedy Funding, Inc. as predecessor-in-interest, and BNP Paribas.....Respondents,

v.

Pawleys Island North, LLC, Will Darwin Wheeler, Peggy Wheeler-Cribb, and J. Mars Sapp,
Defendants, of whom Pawleys Island North, LLC, Will Darwin Wheeler and Peggy Wheeler-
Cribb are Respondents and

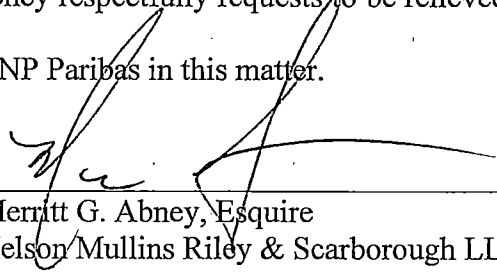
J. Mars Sapp is theAppellant.

MOTION TO BE RELIEVED AS COUNSEL

YOU WILL PLEASE TAKE NOTICE THAT the undersigned attorney for the above named Respondents Kennedy Funding, Inc. as predecessor-in-interest, and BNP Paribas hereby move the Court for an Order relieving him as an attorney of record for the Respondents in the above captioned case. In support thereof, the undersigned shows the Court the following:

1. Robert H. Jordan has left his employment with Nelson Mullins Riley & Scarborough LLP and joined the firm of Parker Poe Adams & Bernstein LLP.
2. Mr. Jordan and other counsel at Parker Poe Adams & Bernstein LLP will continue to represent the Respondents in this case, and no party will be prejudiced by this change in representation.
3. Merritt G. Abney will no longer participate in this case.

WHEREFORE, attorney Merritt G. Abney respectfully requests to be relieved as counsel for Respondents Kennedy Funding, Inc. and BNP Paribas in this matter.



Merritt G. Abney, Esquire
Nelson Mullins Riley & Scarborough LLP
151 Meeting Street / Sixth Floor
Post Office Box 1806 (29402-1806)
Charleston, SC 29401-2239
(843) 853-5200

Attorneys for Respondents Kennedy Funding, Inc.
and BNP Paribas

August 24, 2016

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

The Honorable Joe M. Crosby, Master-in-Equity

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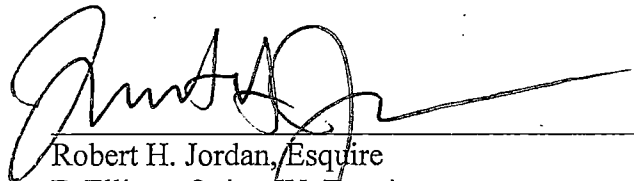
PROOF OF SERVICE

I certify that I have served Motion to be Relieved as Counsel on opposing counsel by
depositing a copy of it in the United States Mail, postage prepaid, on **August 24, 2016** addressed
as follows:

Thomas W. Bunch, II, Esq.
Paul H. Hoefler, Esq.
Robinson, McFadden & Moore, P.C.
Post Office Box 944
Columbia, SC 29202

Robert H. Gwinn, III, Esq.
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Robert H. Jordan, Esquire
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Atlanta, GA
Charleston, SC
Charlotte, NC
Columbia, SC
Greenville, SC
Raleigh, NC
Spartanburg, SC

August 24, 2016

VIA OVERNIGHT DELIVERY

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

RECEIVED
AUG 25 2016
SC Court of Appeals

Re: Kennedy Funding, Inc., as predecessor-in-interest, and BNP Paribas v. Pawleys
Island North, LLC, et al
State Court Case No. 2011-CP-22-00180
Appellate Case No. 2013-001447

Dear Ms. Kitchings:

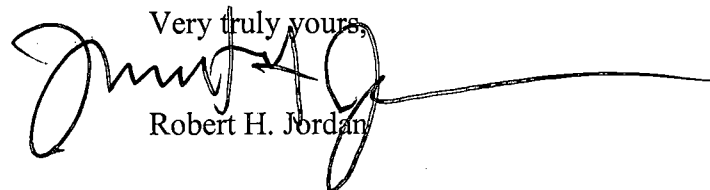
Enclosed for filing please find an original and a copy of each of the following:

1. Certificate of Counsel relating to the Supplemental Brief of Respondents; and
2. Motion to be Relieved as Counsel.

Also enclosed is the filing fee for the Motion to be Relieved as Counsel.

Please file originals and return clocked copies in the self-addressed, stamped envelope provided.

By copy of this letter, we are serving the same on opposing counsel.

Very truly yours,

Robert H. Jordan

RHJ/kjg
Enclosures

cc: Thomas W. Bunch, II, Esq.
Robert H. Gwinn, III, Esq.
Merrit G. Abney, Esq.

PPAB 3379130v1

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UNITED STATES US

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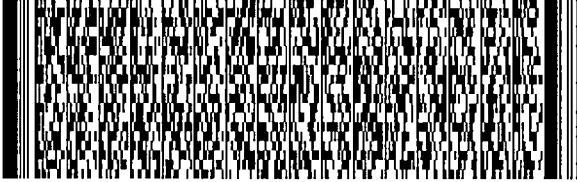
TO HONORABLE JENNY ABBOTT KITCHINGS
SOUTH CAROLINA COURT OF APPEALS
1220 SENATE STREET

COLUMBIA SC 29201

(803) 734-1890 REF: 149845

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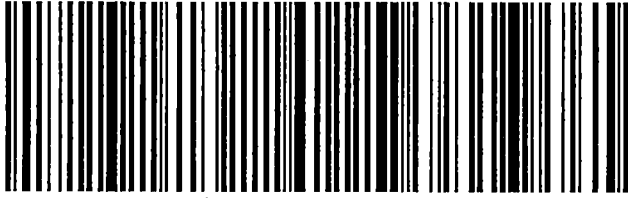
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SC Court of Appeals