

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Alan F. McNeal And  
Adrienne McNeal,

Appellants,

v.

Ocwen Loan Servicing,  
LLC, and Nationstar  
Mortgage, LLC,  
Defendants, Of Whom  
Ocwen Loan Servicing,  
LLC is the

Respondent

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SC Court of Appeals

Appellate Case No. 2016-001616

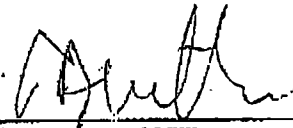
The Honorable Marvin H. Dukes, III  
Beaufort County  
Trial Case No. 2015-CP-07-1340

SUPPLEMENT TO THE MOTION TO WITHDRAW FROM  
REPRESENTATION OF APPELLANTS

November 22, 2016

WILLIS LAW OF SOUTH CAROLINA  
18 Ribaut Dr.  
Hilton Head Island, SC 29926  
Telephone No: (843) 342-2392  
tawillis@willislaws.com

By:

  
Terence A. Willis  
S.C. State Bar No. 101429  
Attorney for Appellants

**Supplement to the Motion to Withdraw from Representation of Appellants**

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November 22, 2016

**NOW COMES Terence A. Willis, attorney for the appellants, Alan F. McNeal and Adrienne McNeal, and files this his Supplement to the Motion to Withdraw from Representation of Appellants and in support thereof would show the following:**

1. Terence A. Willis mailed his Motion to Withdraw on November 21, 2016 and is still entitled to withdraw from the representation of Alan F. McNeal and Adrienne McNeal according to South Carolina Rules of Professional Conduct Rule 1.16(b)(5) & (6) and Terence A. Willis has complied with the requirements of said rule.
2. Terence A. Willis has attempted to communicate with Alan F. McNeal, the client contact, by email and telephone and with both Mr. and Mrs. McNeal by letter, sent first class mail and certified mail, about this motion and his request that they meet with him. but neither attempted to contact him until Mr. McNeal wrote an email to Mr. Willis late on the 21st of November, 2016, in which he represented he would pay the balance of the amount owed and the expense escrow account advance requested by cashier's check on this coming Wednesday. Mr. McNeal made no representations about payment of ongoing fees and expenses. Mr. McNeal has made these promises before and has not keep them. The last event was an NFS check received by Mr. Willis in late October, 2016. Since Mr. Willis agreed to a reduced fee arrangement with these Clients, non-payment is an

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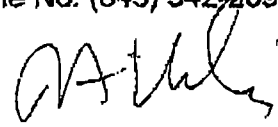
Supplement to the Motion to Withdraw from Representation of Appellants  
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unreasonable financial burden on Mr. Willis especially given the complexity of the case and the legal issues.

**WHEREFORE**, Terence A. Willis prays that this Court grant his Motion to Withdraw on such terms as the Court finds just and appropriate.

Respectfully submitted on November 22, 2016

WILLIS LAW OF SOUTH CAROLINA  
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Hilton Head Island, SC 29926  
Telephone No: (843) 342-2392

By: 

Terence A. Willis  
S.C. State Bar No. 101429  
Attorney for Appellants

**PROOF OF SERVICE**

I certify that I have served the Terence A. Willis' Motion to Withdraw from Representation of Appellants by depositing a copy of it in the United States Mail, postage prepaid, on November 22, 2016, addressed to its attorneys of record, Sean A. O'Connor, Finkel Law Firm LLC, 4000 Faber Place Drive | Suite 450, North Charleston, South Carolina 29405 and Michael W. Smith, Baker Donelson, 200 South Orange Avenue, Suite 2900, Orlando, FL 32801, and on Alan F. McNeal and Adrienne McNeal by depositing a copy of it in the United States Mail, postage prepaid, on November 22, 2016,

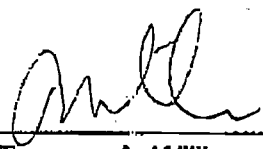
Supplement to the Motion to Withdraw from Representation of Appellants

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November 22, 2016

addressed to Mr. Alan and Mrs. Adrienne McNeal at 44 Thomas Sumter St.,  
Beaufort, SC 29907 and by email to Mr. Alan F. McNeal.

**WILLIS LAW OF SOUTH CAROLINA**  
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Hilton Head Island, SC 29926  
Telephone No: (843) 342-2392

By:   
\_\_\_\_\_  
Terence A. Willis  
S.C. State Bar No. 101429  
Attorney for Appellants

# Willis Law of South Carolina

Justice for Consumers

Terence A. Willis

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(843) 342-2392

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SC Court of Appeals

November 22, 2016

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

Re: Appellate Case No. 2016-001616  
Alan F. McNeal and Adrienne McNeal, Appellants vs.  
Ocwen Loan Servicing, LLC and Nationstar Mortgage LLC,  
Defendants, Of Whom Ocwen Loan Servicing, LLC is the  
Respondent  
Our File No. 60117-1

Dear Ms. Kitchings:

Enclosed for filing is Supplement to the Motion of Terence A. Willis to Withdraw from Representation of Alan F. McNeal and Adrienne McNeal, Appellants, and Proof of Service of same.

Please file the Motion and mail a file-stamped copy back to me in the enclosed self-addressed stamped envelope.

Sincerely,



Terence A. Willis  
WILLIS LAW OF SOUTH CAROLINA  
18 Ribaut Dr.  
Hilton Head Island, SC 29926  
Telephone No: (843) 342-2392  
Attorney for Appellants

**Letter to The Honorable Jenny Abbott Kitchings**  
**November 22, 2016**  
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**cc: Mr. Sean A. O'Connor**  
**Finkel Law Firm LLC**  
**4000 Faber Place Drive I Suite 450**  
**North Charleston, SC 29405**

**Mr. Michael W. Smith**  
**Balcer, Donelson, Beaman, Caldwell and Berkowitz, PC**  
**200 South Orange Avenue, Suite 2900**  
**Orlando, FL 32801**

**Mr. Alan and Mrs. Adrienne McNeal**  
**44 Thomas Sumter St.**  
**Beaufort, SC 29907 1909**

## FAX COVER SHEET

### Willis Law of South Carolina

Terence A. Willis

18 Ribaut Dr.

Hilton Head Island, SC 29926

(843) 342-2392

Emails: [tawillis@willislawsc.com](mailto:tawillis@willislawsc.com)

**DATE:** November 22, 2016

**TO:** Clerk, Court of Appeal of South Carolina

**FACSIMILE NUMBER:** (803) 734-1839

**FROM:** Terence A. Willis

**# OF SHEETS (not including the cover sheet):** 12

**MESSAGE (if any):** Please find the Motion to Withdraw and the Supplement of the Motion to Withdraw. They have both been sent by mail and served as required.

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