

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas
The Honorable Marvin H. Dukes, III, Special Circuit Court Judge

Appellate Case No. 2016-001899
Case No. 2016-CP-07-1778

A&B Associates, L.P. Plaintiff/Respondent,

v.

FCRE REL, LLC; and TIDELAND REALTY, INC..... Defendants,

Of whom FCRE REL, LLC is the..... Appellant.

PROOF OF SERVICE

This is to certify that I have this day served the following counsel of record and Appellant in the foregoing matter with a copy of the foregoing **MOTION OF APPELLANT TO ALLOW MOORE & VAN ALLEN PLLC TO BE RELIEVED AS COUNSEL OF RECORD** by depositing same in the United States Mail with adequate postage affixed thereon to ensure delivery, addressed as follows:

Curtis L. Coltrane, Esquire
Timothy Granitz, Esquire
Coltrane & Wilkins, LLC
Post Office Drawer 6808
Hilton Head Island, SC 29938

-AND-

Brian H. Mahany, Esquire
Timothy Granitz, Esquire
Mahany Law
Post Office Box 511328
Milwaukee, WI 53133

Benjamin T. Coppage, Esquire
Coppage Law Firm, LLC
1010 Carteret Street
Beaufort, SC 29902

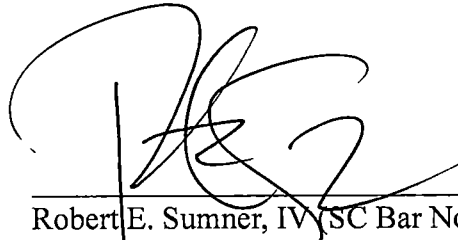
FCRE REL, LLC
c/o Keith B. Joseph, Litigation Counsel
Freedom Mortgage Corporation
907 Pleasant Valley Avenue, Suite 3
Mount Laurel, NJ 08054

FCRE REL, LLC
c/o Mary Davenport, Executive Vice President
Freedom Mortgage Corporation
623 Fifth Avenue, 24th Floor
New York, NY 10022

RECEIVED

MAY 01 2017

SC Court of Appeals



Robert E. Sumner, IV (SC Bar No. 71728)

Lesley A. Firestone (SC Bar No. 100080)

Douglas M. Muller (SC Bar No. 10277)

MOORE & VAN ALLEN PLLC

78 Wentworth Street

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Charleston, SC 29413-2828

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dougmuller@mvalaw.com

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Attorneys for Appellant FCRE REL, LLC

April 28, 2017



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

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April 25, 2017

Mr. Douglas M. Muller, Esquire
PO Box 22828
Charleston SC 29413-2828

Mr. Robert Ernest Sumner, IV, Esquire
PO Box 22828
Charleston SC 29413-2828

Ms. Lesley Anne Firestone, Esquire
78 Wentworth St.
PO Box 22828
Charleston SC 29413-2828

Re: A & B Associates, L.P. v. FCRE REL, LLC
Appellate Case No. 2016-001899

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Dear Counsel:

Upon reviewing your motion to be relieved as counsel, the following deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter:

- The required filing fee has not been submitted. The correct filing fee is \$25.00.
- You have not provided a proof of service showing the motion has been served on your client as required by Rule 264(b), SCACR.

received
4-27-17 WS

Very truly yours,

V. Claire Allen, Deputy

CLERK

cc: Benjamin Terrell Coppage, Esquire
Curtis Lee Coltrane, Esquire

83270

Moore & Van Allen

April 28, 2017

Robert E. Sumner, IV
Attorney at Law

T 843 579 7018
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robertsumner@mvalaw.com

VIA U.S. MAIL

Moore & Van Allen PLLC

78 Wentworth St.
Charleston, SC 29401-1428

The Honorable V. Claire Allen
Deputy Clerk, South Carolina Court of Appeals
1220 Senate Street
P.O. Box 11629
Columbia, South Carolina 29211

Mailing Address:
Post Office Box 22828
Charleston, SC 29413-2828

Re: *A&B Associates, L.P. v. FCRE REL, LLC; and TIDELAND REALTY, INC.*
Appellate Case No. 2016-001899
Case No. 2016-CP-07-1778
Our File No. 042814.000001

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SC Court of Appeals

Dear Ms. Allen:

We are in receipt of your letter dated April 25, 2017, in regard to FCRE REL, LLC's Motion to be Relieved as Counsel, and deficiencies noted under the South Carolina Appellate Court Rules (SCACR) regarding same. A copy of your letter is enclosed for reference.

Enclosed please find our firm check no. 33975 in the amount of \$25.00 for payment of the requisite filing fee. Also enclosed please find an original and one (1) copy of the Proof of Service on our client FCRE REL, LLC, for the Motion to be Relieved as Counsel.

Please file the original Proof of Service, along with the original motion documents previously mailed on April 21, 2017, and return a date-stamped copy of each to me in the enclosed self-addressed stamped envelope provided.

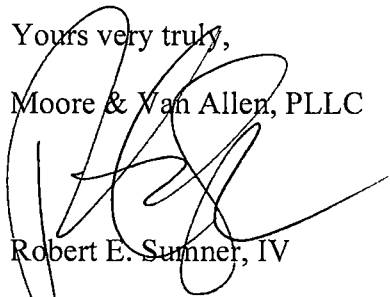
By copy of this letter, I am serving all counsel of record and FCRE REL, LLC with a copy of the same.

Thank you for your assistance in this matter.

Charlotte, NC
Research Triangle Park, NC
Charleston, SC

Yours very truly,

Moore & Van Allen, PLLC



Robert E. Sumner, IV

RES/meh

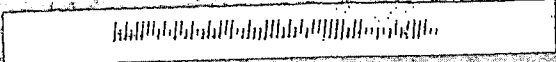
Enclosures: as stated.

cc: Curtis L. Coltrane, Esquire
Brian H. Mahany, Esquire
Timothy Granitz, Esquire
Benjamin T. Copping, Esquire
Keith B. Joseph, Esquire
Mary Davenport
Douglas M. Muller, Esquire



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