

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM EDGEFIELD COUNTY
Court of Common Pleas

Jocelyn Newman, Circuit Court Judge

Case No. 2015-CP-19-0068

Moore's Church,

Appellant,

v.

African Methodist Episcopal
Church, Inc., Bishop Elder
Franklin Norris, Elder Rev.
Rosalyn Coleman, and Dr.
Vincent Johnson

Respondents.

MOTION TO WITHDRAW

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MAY 30 2017

SC Court of Appeals

Comes now, Adrienne L. Turner, Attorney for Appellant Moore's Church, and in support of her Motion to Withdraw as Counsel of record for Appellant Moore's Church, states:

1. The undersigned Counsel filed and served the Notice of Appeal in this matter on behalf of Moore's Church as a courtesy and at Appellant's direction in order to insure that Appellant met the applicable time limitations for pursuing an appeal.
2. Since the time of filing, Appellants have declined to retain the undersigned Counsel's services to continue pursuing the appeal.
3. Counsel for Moore's Church has taken reasonable steps to avoid any foreseeable prejudice to the rights of Moore's Church, including insuring that Respondents were timely served with the Notice of Appeal and advising Appellants as to the propriety and/or necessity of a timely Motion to Stay under the particular facts and circumstances of this case.
4. Notice of this Motion has been provided to Moore's Church and Moore's Church is aware of the need to obtain other counsel should the Church wish to move

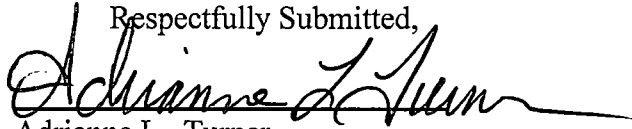
forward with the appeal.

5. Counsel for Moores Church requests that any applicable deadlines associated with this appeal be held in abeyance pending the Court issuing its ruling on this motion.

WHEREFORE, Adrienne L. Turner, ATTORNEY FOR APPELLANT MOORES CHURCH prays that her motion to Withdraw as Counsel for Moores Church be granted.

May 24, 2017

Respectfully Submitted,



Adrienne L. Turner

Post Office Box 210638

Columbia, South Carolina 29221

(803) 467-8687

Attorney for Appellant

aturner@turnerlawsc.com

Other Counsel of Record:

Kenneth A. Davis

220 Stoneridge Drive, Suite 100

Columbia, South Carolina 29210

Attorney for Respondents

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PROOF OF SERVICE

I certify that I have on this date caused to be served a copy of the Motion to Withdraw on the following counsel of record via first class mail, postage prepaid and/or hand delivery addressed to:

Kenneth A. Davis
Boykin, Davis and Smiley
220 Stoneridge Drive, Suite 100
Columbia, South Carolina 29210

Moores Church
236 Moores Drive
Edgefield, SC 29824

May 24, 2017


Adrienne L. Turner



Turner Law, LLC

P.O. Box 210638, Columbia, South Carolina 29221 803.467.8687 aturner@turnerlawsc.com

May 24, 2017

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

Re: Moore Church v. African Methodist Episcopal Church, Inc. et al

Dear Ms. Kitchings:

Please find enclosed for filing Appellant Counsel's Motion to Withdraw as Counsel.

By copy of this letter, I am serving the same on Moore Church, and respondents' counsel of record, Kenneth A. Davis.

With kind regards, I am

Sincerely,



Adrienne L. Turner

Enclosures

cc: Kenneth A. Davis.
Judge Jocelyn Newman

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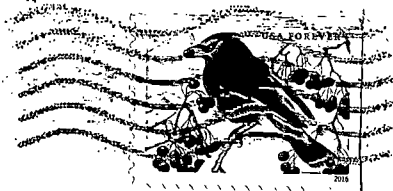
SC Court of Appeals

§ Turner Law, LLC

P.O. Box 210638, Columbia, South Carolina 29221

COLUMBIA SC 29201

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

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