

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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JUN 13 2017

SC Court of Appeals

APPEAL FROM FLORENCE COUNTY
In the Court of Common Pleas

The Honorable Craig D. Brown, Presiding Judge

Appellate Case No. 2015-001941

Elizabeth J. Langley.....Appellant,

v.

Wendy J. Lynch, Rebecca M. Lynch, James M. Lynch, II, Donald Jordon, III, Jimmy White and
S. Porter Stewart, II, as Personal Representative of the Estate of James M. Lynch,

Of Whom Wendy J. Lynch is theRespondent.

MOTION TO BE RELIEVED AS COUNSEL

Appellant, by and through her undersigned counsel hereby moves for an Order of this Court pursuant to Rule 264 of the *South Carolina Appellate Court Rules*, relieving the current attorney, J. René Josey, Esquire, of the law firm Turner Padgett Graham & Laney, PA and allowing Appellant to proceed *pro se*. Unknown to counsel until after filing, Appellant timely submitted a *pro se* Petition for Rehearing and has requested that counsel seek to be relieved so that she might proceed and have this Petition considered. A consultation with Respondent's counsel has been initiated.

[SIGNATURE PAGE TO FOLLOW]

TURNER PADGET GRAHAM & LANEY, PA

By: J. René Josey /cjs
J. René Josey, Esquire
S.C. Bar #3230
Post Office Box 5478 (29502)
Florence, South Carolina 29501
(843) 662-9008
(843) 667-0828 fax
Email: RJosey@turnerpadget.com

ATTORNEYS FOR APPELLANT

I agree and so request:

See attached
Elizabeth J. Langley

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PROOF OF SERVICE

I certify this 13th day of June 2017 that I have served copies of the MOTION TO
RECALL REMITTITUR and the MOTION TO BE RELIEVED AS COUNSEL by mailing
same, postage prepaid in the United States mail, addressed to the following:

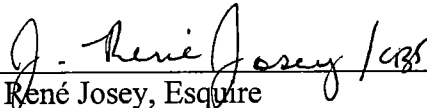
Joseph M. McCulloch, Jr., Esquire
Kathy R. Schillaci, Esquire
Law Offices of Joseph M. McCulloch, Jr.
Post Office Box 11623
Columbia, SC 29211

Elizabeth J. Langley
1225 Edgewood Avenue
Florence, SC 29501

(Signature page to follow.)

TURNER, PADGET, GRAHAM & LANEY, P.A.

June 13, 2017



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June 13, 2017

VIA HAND DELIVERY

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

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JUN 13 2017

SC Court of Appeals

Re: Elizabeth J. Langley v. Wendy J. Lynch, et al.
Appellate Case No.: 2015-001941
File No.: 13799.101


Dear Ms. Kitchings:

Enclosed please find the originals and seven copies each of the Motion To Recall Remittitur and the Motion To Be Relieved As Counsel regarding the above-referenced matter. Also enclosed are the original and one copy of the Proof of Service and our checks for the filing fees. Please file the original documents and return clocked copies to me via our office courier. Thank you for your assistance with this matter, and please contact me if you have any questions.

With kind regards, I am

Very truly yours,

TURNER, PADGET, GRAHAM & LANEY, P.A.


J. René Josey

CBS/tj

Enclosures

cc: Elizabeth J. Langley
Joseph M. McCulloch, Jr., Esquire
Kathy R. Schillaci, Esquire
(w/enc.)