

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable R. Markley Dennis, Jr.
Circuit Court Judge

Case No. 2013-CP-10-05329
Appellate Case No. 2016-000028

RECEIVED
NOV 27 2017
SC Court of Appeals

JPMorgan Chase Bank, National Association,

Appellant,

v.

Delilah Starr Acheson a/k/a Delilah S. Acheson a/k/a
Starr D. Acheson, individually, as Legal Heir and
Personal Representative of the Estate of Joseph L.
Acheson a/k/a Joseph Lynn Acheson, Sr., Deceased,
Amber Mae Acheson Reed, Joseph Lynn Acheson, Jr.,
Jacob Lee Acheson, and Daniel Alexander Acheson, as
Legal Heirs or Devisees of the Estate of Joseph L.
Acheson a/k/a Joseph Lynn Acheson, Sr., Deceased,
Ronald Lee Dowell, Ruth C. Dowell, and Charleston
County Revenue Collections,

Defendants.

Of whom Delilah Starr Acheson a/k/a Delilah S.
Acheson a/k/a Starr D. Acheson, individually, as Legal
Heir and Personal Representative of the Estate of
Joseph L. Acheson a/k/a Joseph Lynn Acheson, Sr.,
Deceased, Amber Mae Acheson Reed, Joseph Lynn
Acheson, Jr., Jacob Lee Acheson, and Daniel
Alexander Acheson, as Legal Heirs or Devisees of the
Estate of Joseph L. Acheson a/k/a Joseph Lynn
Acheson, Sr., Deceased, Ronald Lee Dowell, and Ruth
C. Dowell, are

Respondents

Motion for Withdrawal of Counsel and Notice of Appearance

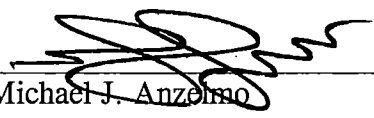
Appellant JPMorgan Chase Bank, National Association, moves this Court for an order allowing Michael J. Anzelmo to withdraw as counsel of record for it in this matter. The basis for this motion is that Michael Anzelmo will resign from Nelson Mullins Riley & Scarborough LLP to accept a job as Chief of Staff and Counsel to the Speaker of the South Carolina House of Representatives with an effective date of December 1, 2017.

Chase will not be prejudiced by this withdrawal because it will continue to be represented in this matter by B. Rush Smith, III, and Sarah B. Nielsen both of Nelson Mullins Riley & Scarborough LLP. B. Rush Smith, III, and Sarah B. Nielsen hereby enter appearances for Chase in this appeal.

Chase requests that Michael J. Anzelmo be relieved as counsel and removed from the court roster in this matter.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: _____


Michael J. Anzelmo
SC Bar No. 72933
E-Mail: michael.anzelmo@nelsonmullins.com

B. Rush Smith III
SC Bar No. 012941
E-Mail: rush.smith@nelsonmullins.com
Sarah B. Nielsen
SC Bar No. 78384
E-Mail: sarah.nielsen@nelsonmullins.com
1320 Main Street / 17th Floor
Post Office Box 11070 (29211-1070)
Columbia, SC 29201
(803) 799-2000

Attorneys for JPMorgan Chase Bank, National Association

November 27, 2017

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v.

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Ronald Lee Dowell, Ruth C. Dowell, and Charleston
County Revenue Collections, Defendants.

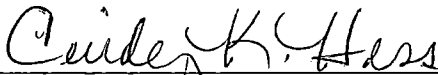
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Alexander Acheson, as Legal Heirs or Devisees of the
Estate of Joseph L. Acheson a/k/a Joseph Lynn
Acheson, Sr., Deceased, Ronald Lee Dowell, and Ruth
C. Dowell, are Respondents

PROOF OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for JPMorgan Chase Bank, National Association, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified to the following address(es):

Pleadings: **Notice of Withdrawal of Counsel**

Counsel Served: **U.S. Mail**
Alice F. Paylor, Esq.
Rosen Rosen & Hagood, LLC
Post Office Box 893
Charleston, SC 29402



Cindy K. Hess
Sr. Administrative Assistant

November 27, 2017



NELSON MULLINS

NELSON MULLINS RILEY & SCARBOROUGH LLP
ATTORNEYS AND COUNSELORS AT LAW

Michael J. Anzelmo
T 803.255.9312 F 803.255.9024
michael.anzelmo@nelsonmullins.com

1320 Main Street | 17th Floor
Columbia, SC 29201
T 803.799.2000 F 803.256.7500
nelsonmullins.com

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SC Court of Appeals

Hand Delivered

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street (29201)
Post Office Box 11629
Columbia SC 29211

RE: JPMorgan Chase Bank, National Association v. Delilah Star Acheson, et al.
Appellant Case No. 2016-00028
Our File No. 11281/02229

Dear Ms. Kitchings:

Enclosed for filing in the above-reference matter please find the original and one copy of a Notice of Withdrawal of Counsel. Please return a clocked-in copy to us via our courier.

By copy of this letter, we are serving all counsel with this document.

Very truly yours,

Michael J. Anzelmo

MJA:ckh
Enclosures
cc: Alice F. Paylor, Esquire