

THE STATE OF SOUTH CAROLINA

In the Supreme Court

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

Appellate Case No. 2016-000320

Circuit Case No. 2012-CP-10-1332

RECEIVED

APR 04 2018

S.C. SUPREME COURT

BETTY FISHER, as Real Representative
For Alice Shaw-Baker.....Appellant
v.

BESSIE HUCKABEE, KAY PASSAILAGUE SLADE,
SANDRA BYRD, and PETER KOUTEN, and DOES 1 through 100, Defendants,

Of Whom BESSIE HUCKABEE, KAY PASSAILAGUE SLADE,
SANDRA BYRD, and PETER KOUTEN are.....Respondents

MOTION TO WITHDRAW AS COUNSEL

COMES NOW John Hughes Cooper, counsel for Plaintiff in the above captioned action,
and with consent of Betty Fisher, moves this honorable Court to withdraw as Counsel for Betty
Fisher in the above captioned action.

On behalf of myself, my partner, John Townsend Cooper, and my firm, John Hughes
Cooper, P.C., I hereby move to withdraw from the representation of my client, Betty Fisher, in the
above captioned action and move that my client be granted a reasonable time to find and retain
competent local counsel. The reason for this motion is that an actual conflict of interest has arisen
in a closely related matter which prevents my further representation of my client in that matter and

presents an unreasonable risk of future actual conflict in this matter. Betty Fisher consents to this motion and a copy of her written consent is attached hereto and made a part hereof.

RESPECTFULLY SUBMITTED,

JOHN HUGHES COOPER, P.C.

By: 

JOHN HUGHES COOPER, ESQUIRE

Federal Court ID 298

South Carolina Bar 1387

State Bar of Georgia 185986

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843-883-9099; fax 843-883-9335

ATTORNEYS FOR PLAINTIFF,
BETTY FISHER

WRITTEN CONSENT OF CLIENT TO WITHDRAWAL

COMES NOW Betty Fisher, Plaintiff in the above captioned action, and consents to the withdrawal of John Hughes Cooper, John Townsend Cooper, and John Hughes Cooper, P.C. as counsel for Plaintiffs in Appellate Case 2016-000320.


Betty Fisher

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PROOF OF SERVICE

I certify that on April 2, 2018, I served a copy of **Motion to Withdraw as Counsel** on the Respondents and interested parties by depositing same in the United States Mail, postage prepaid, addressed as follows:

Evan Smith, Esquire
P.O. Box 976
Charleston, SC 29402
(Attorney for Respondent Peter A. Kouten)

W. Westbrook Wills, III, Esquire
P.O. Box 822
Folly Beach, SC 29439
(Attorney for Respondents Bessie Huckabee
Kay Passailaigue Slade, and Sandra Byrd)

Ms. Betty Fisher
P.O. Box 91112
Long Beach, CA 90809-1112

Lisa Fisher, Esquire
P.O. Box 91112
Long Beach, CA 90809-1112

April 2, 2018

RESPECTFULLY SUBMITTED:

JOHN HUGHES COOPER, P.C.



JOHN HUGHES COOPER, ESQUIRE

Federal Court ID 298

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ATTORNEYS FOR APPELLANT