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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

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

Circuit Court Case No. 2017-CP-10-4112
S.C. Court of Appeals Case No. 2018-000249

Chris Khamnei,

Appellant,

v.

Columbus Street Holdings,
LLC; Roy T. Willey IV and
Eric M. Poulin, individually,

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MAY 17 2018

SC Court of Appeals

Respondents.

MOTION TO WITHDRAW AS COUNSEL FOR APPELLANT

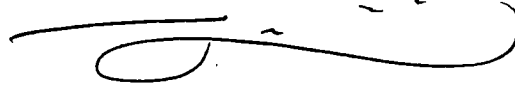
Comes Now W. Westbrook Wills III, counsel for Appellant in the above captioned action, and with the consent of Chris Khamnei, moves this honorable Court to withdraw as counsel for Appellant in the above-captioned appeal.

On behalf of myself and my firm Law Office of W. Westbrook Wills III, I hereby move to withdraw from the representation of Chris Khamnei, in the above-captioned appeal, and move that Mr. Khamnei be granted a reasonable time to find and retain competent local counsel, if he

should desire to hire replacement counsel. The reason for this motion is that an actual conflict of interest has arisen which prevents my further representation of him in this and other matters. Chris Khamnei consents to this motion and a copy of his written consent is attached hereto and made a part hereof.

Respectfully submitted,

LAW OFFICE OF
W. WESTBROOK WILLS III



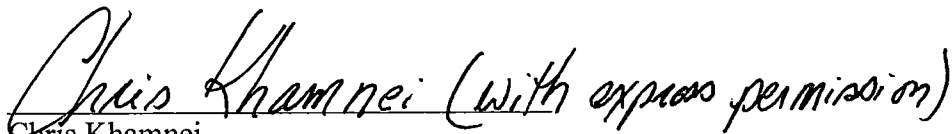
W. Westbrook Wills III
PO Box 822
Folly Beach, SC 29439
(843) 805-6300 (telephone)
(866) 922- 8596 (facsimile)
wwills@wwillslaw.com
ATTORNEY FOR APPELLANT

Other counsel of record:

Stefan B. Feidler, Esq.
Anastopoulo Law Firm, LLC
32 Ann Street
Charleston, SC 29203
ATTORNEY FOR RESPONDENTS

WRITTEN CONSENT OF CLIENT TO WITHDRAWAL

COMES NOW Chris Khamnei, Appellant in the above-captioned appeal, and consents to the withdrawal of W. Westbrook Wills III and the Law Office of W. Westbrook Wills III as counsel for Appellant in the appeal of Civil Action No. 2017-CP-10-4112, Appellate Case No. 2018-000249, filed in the Court of Appeals on February 14, 2018.


Chris Khamnei

From: **Chris Khamnei** chriskhamnei@gmail.com
Subject: Re: Court of appeals.
Date: May 11, 2018 at 3:07 PM
To: W. Westbrook Wills III wwills@wwillslaw.com



You have permission to sign on my behalf

Chris C. Khamnei, Ph.D.
Green Mountain Real Estate
199 S. Union St.,
Burlington, VT 05401
(802) 222-6080 (Main)
(802) 222-6081 (Fax)
(802) 222-6090 (Maintenance)
Chris@RentInVT.com

On May 11, 2018, at 2:52 PM, W. Westbrook Wills III <wwills@wwillslaw.com> wrote:

Chris, can you give me permission to sign the motion to withdraw as counsel in the court of appeals on your behalf. I have to send it in like 15 minutes.

If you would send permission to me in esperante email just saying I have permission to sign on your behalf. Call me if you are available to discuss.

Brook

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

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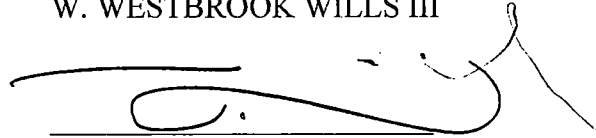
Respondents.

PROOF OF SERVICE

I certify that I have served the foregoing **Motion to Withdraw as Counsel** on the Respondents by depositing a copy of it in the U.S. Mail, postage prepaid, on May 11, 2018 addressed to their attorney of record, Stefan B. Feidler, Esq., Anastapoulo Law Firm, LLC, 32 Ann Street, Charleston, SC 29403.

[Signature on following page]

LAW OFFICE OF
W. WESTBROOK WILLS III



W. Westbrook Wills III
PO Box 822
Folly Beach, SC 29439
(843) 805-6300 (telephone)
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wwills@wwillslaw.com
ATTORNEY FOR APPELLANT

Other counsel of record:

Stefan B. Feidler, Esq.
Anastopoulo Law Firm, LLC
32 Ann Street
Charleston, SC 29203
ATTORNEY FOR RESPONDENTS

THE LAW OFFICE OF
W. WESTBROOK WILLS III

W. WESTBROOK WILLS III
Admitted in Georgia & South Carolina

CIVIL TRIAL LAWYER
P.O. BOX 822
FOLLY BEACH, SC 29439

TELEPHONE: (843) 805-6300
FACSIMILE: (866) 922-8596
wwills@wwillslaw.com

May 11, 2018

VIA US MAIL

Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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SC Court of Appeals

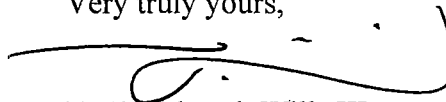
Re: *Chris Khamnei v. Columbus Street Holdings, LLC:*
Appellate Case No. 2018-00024;
Circuit Court Case No. 2017-CP-10-4112

Dear Ms. Kitchings:

Please find enclosed the original and 7 copies of counsel for Appellant and Appellant's Motion to Withdraw as Counsel for Appellant with Proof of Service, and the original and 7 copies of Appellant's Reply to Respondents' Motion to Dismiss with Proof of Service. Also enclosed is a firm check in the amount of \$25.00 for the motion filing fee, and a return, stamped envelope. I have copied Stefan Feidler, Esq., attorney for Respondents, with a copy of this letter and the motion.

Please do not hesitate to contact me with any questions or if I can provide any further information with regard to this motion.

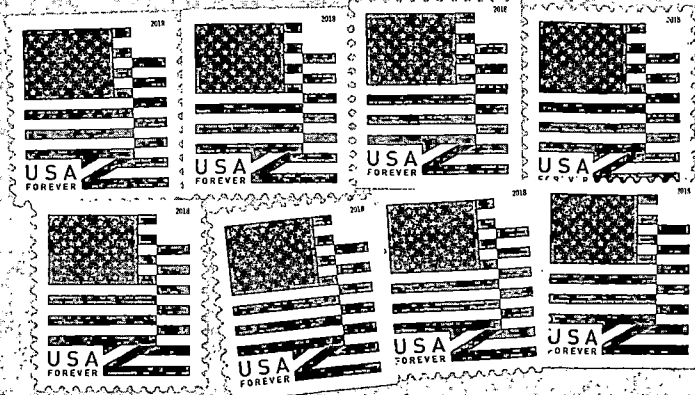
Very truly yours,



W. Westbrook Wills III

Enclosures (as stated)

cc: Stefan Feidler, Esq. (w/ enclosures)
Chris Khamnei



LAW OFFICE OF
W. Westbrook Wills III
CIVIL TRIAL LAWYER
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FOLLY BEACH, S.C. 29439

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Clerk of Court
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