



87086

STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

The Honorable R. Knox McMahon, Circuit Court Judge

Case No. 2017-CP-32-01333

RECEIVED
JUN 22 2018
SC Court of Appeals

Erick George Johnson,Appellant,

vs.

Abigail Marie Williams, Respondent.

MOTION TO BE RELIEVED AS COUNSEL FOR THE RESPONDENT

Pursuant to Rules 240(d) and 264(b), SCACR, the undersigned counsel, Richard W. Bolen, hereby moves to be relieved as counsel for the Respondent. Counsel would show this Court the following:

1. Counsel appeared before the lower court on the Respondent's motion to dismiss the Appellant's complaint on August 31, 2017. The Circuit Court granted the motion by formal written order filed April 28, 2018. The Appellant filed his notice of appeal on May 11, 2018.
2. Counsel's scope of representation did not include the prosecution or defense of an appeal upon the conclusion of proceedings in the lower court.
3. The Respondent, Ms. Abigail Marie Williams, has consented to the withdrawal of Counsel from this appeal. A copy of Ms. Williams' written consent is attached to this motion as exhibit "A".

4. Counsel requests that the Court grant the Respondent a reasonable amount of time to retain new counsel for the defense of this appeal or, if she does not do so, that she be allowed to defend the appeal *pro se*.

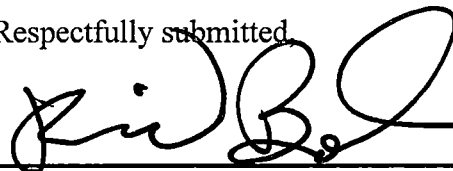
5. The Appellant has not filed the initial brief and designation of matter to be included in the record on appeal at the time of the filing of this motion. Accordingly, Counsel is informed and believes that the Appellant would suffer no prejudice if the motion is granted.

6. Counsel has consulted with the Appellant's counsel, Herbert E. Buhl, III, who has consented to this motion, as shown by the attached printed email at exhibit "B".

WHEREFORE, based on the foregoing, counsel requests that this Honorable Court:

- 1) Grant Counsel's motion to be relieved as counsel for the Respondent,
- 2) Provide the Respondent with a reasonable amount of time to retain substitute counsel if she so chooses, and
- 3) Grant such other and further relief as is just and proper in the premises.

Respectfully submitted,



Richard L. Bolen
GRIER, COX & CRANSHAW, LLC
P.O. Box 2823
2999 Sunset Boulevard
Lexington, SC 29072
(803) 731-0030
rbolen@griercoxandcranshaw.com
MOVANT

June 19, 2018

EXHIBIT "A"

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

Knox McMahon, Circuit Court Judge

Appellate Case No. 2018-000887

Erick George Johnson,

Appellant,

vs.

Abigail Marie Williams,

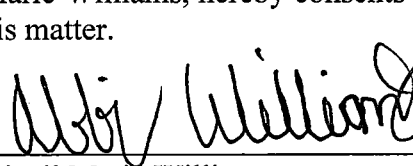
Respondent.

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CONSENT TO WITHDRAWAL OF COUNSEL OF RECORD

The undersigned Respondent, Abigail Marie Williams, hereby consents to the withdrawal of Richard Bolen as her attorney of record in this matter.

June 8, 2018



Abigail Marie Williams
Respondent
2019 San Sus Dive
West Columbia, SC 29170

EXHIBIT "B"

Richard Bolen

From: Herbert E. Buhl, III <hbuhl@bellsouth.net>
Sent: Monday, June 18, 2018 8:50 AM
To: Richard Bolen
Subject: RE: Motion to be relieved as counsel - Johnson v. Williams

Dear Richard,

I have no objection to your being relieved of counsel for Ms. Williams.

Sincerely,

Herbert E. Buhl, III
Attorney at Law
2204 Devine Street
Columbia, SC 29205
(803)799-3767

GRIER, COX & CRANSHAW, LLC
ATTORNEYS AT LAW

F. Barron Grier, III*
James C. (Trey) Cox, III
Bradford W. Cranshaw
Trevor M. Hughey**
G. Robert DeLoach, III

2999 Sunset Boulevard, Suite 200
West Columbia, South Carolina 29169
Telephone (803) 731-0030
Facsimile (803) 731-4059

Mailing Address
Post Office Box 2823
Columbia, South Carolina
29202

Richard L. Bolen (Special Counsel)

E-mail: RBolen@GrierCoxandCranshaw.com
www.GrierCoxandCranshaw.com

* Also Certified Mediator and Arbitrator
** Licensed Attorney in SC & NC

June 19, 2018

The South Carolina Court of Appeals
Attn.: Clerk Jenny Abbott Kitchings
PO Box 11629
Columbia, SC 29211

RECEIVED

JUN 22 2018

SC Court of Appeals

RE: Erick Johnson v. Abigail Williams
Appellate Case No. 2018-000887

Dear Clerk Kitchings,

Enclosed please find a Motion to be Relieved as Counsel along with six copies in the above referenced case. I am also enclosing a check in the amount of \$25.00 for the filing fee. I have also enclosed a copy of the motion to be time-stamped and returned to me in the envelope provided for that purpose. If the motion is granted I will be happy to prepare an order if a form order is not adequate. Please let me know if anything else is needed.

Thank you for your help.

Sincerely,



Richard Bolen

CC: Herb Buhl, Attorney for Petitioner

Enclosures (10)

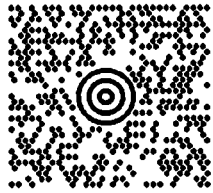
LYNDSAY LIVINGSTON
18039512230
GRIER, COX & CRANSHAW, LLC
2999 SUNSET BOULEVARD
WEST COLUMBIA SC 29169

0.1 LBS LTR

1 OF 1

SHIP TO:

ATTN: CLERK JENNY ABBOTT KITCHINGS
THE SOUTH CAROLINA COURT OF APPEALS
1220 SENATE STREET
COLUMBIA SC 29201-3769

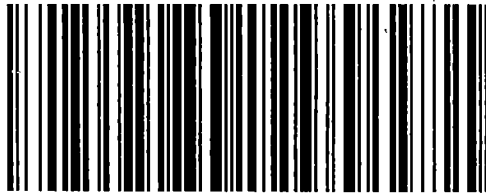


SC 292 9-01



UPS NEXT DAY AIR SAVER 1P

TRACKING #: 1Z RW7 912 13 9593 6551



BILLING: P/P

Reference#1: Abigail Williams

UJS 20.0.42. WNTNV50 99.0A 04/2018



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