

87041

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHESTERFIELD COUNTY
Court of Common Pleas
William O. Spencer, Jr., Special Referee

Case No. 2015-CP-13-00768
Appellate Case No. 2018-000355

RECEIVED
AUG 22 2018
SC Court of Appeals

JP Morgan Chase Bank, National Association,

Respondent,

v.

Fritz A. Timmons,.....

Appellant.

Motion to Withdraw as Counsel and Notice of Appearance

Respondent the JPMorgan Chase Bank, National Association ("Respondent") moves this Court for an order allowing Sarah B. Nielsen to withdraw as counsel of record for Respondent in this matter. The basis for this motion is that Sarah B. Nielsen will resign from Nelson Mullins effective August 31, 2018 to accept a job with the Department of Justice.

Respondent will not be prejudiced by this withdraw of counsel because it will continue to be represented in this matter by B. Rush Smith, III and Nicholas A. Charles both of Nelson Mullins Riley & Scarborough LLP. Nicholas A. Charles hereby enters his appearance for Respondent in this appeal.

Respondent requests that Sarah B. Nielsen be relieved as counsel and removed from the court roster in this matter.

SIGNATURE PAGE ATTACHED

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 

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Attorneys for Respondent JPMorgan Chase Bank, National
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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 by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

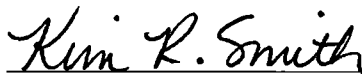
Pleadings:

Motion to Withdraw as Counsel and Notice of Appearance

Counsel Served:

U.S. Mail

Fritz A. Timmons, *pro se*
Post Office Box 367
Hartsville, SC 29551



Kim R. Smith
Administrative Assistant

August 22, 2018

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August 22, 2018

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SC Court of Appeals

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

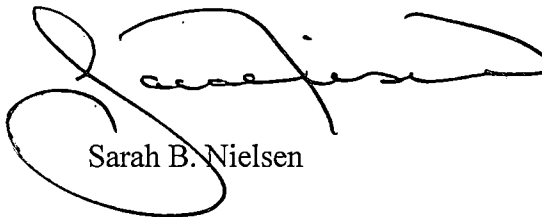
RE: JPMorgan Chase Bank, National Association v. Fritz A. Timmons
Appellate Case No. 2018-000355
Our File No. 011281/02585

Dear Ms. Kitchings:

Enclosed please find the original and one copy of a Motion to Withdraw as Counsel and Notice of Appearance in the above-reference matter. We would ask that you file the original and return a clocked-in cope to us in the envelope provided.

By copy of this letter to Fritz A. Timmons, *pro se*, we are serving him with a copy of this motion.

Very truly yours,



Sarah B. Nielsen

SBN:krs
Enclosures
cc: Fritz A. Timmons, *pro se*