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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Common Pleas

Alison Renee Lee, Circuit Court Judge

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MAR 04 2019
SC Court of Appeals

Case No. 2018-CP—32-01221
Appellate Case No.: 2018-002134

Bryan Walling Respondent

v.

Judi Castro d/b/a A Mother's Prayer Appellant

NOTICE OF AND MOTION TO BE RELIEVED AS COUNSEL FOR THE APPELLANT

TO: THE APPELLANT, JUDI CASTRO

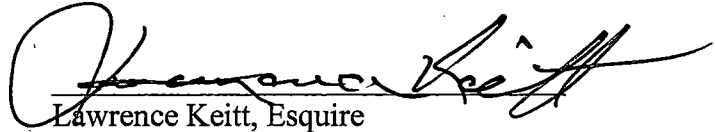
YOU WILL TAKE NOTICE hereby that on the tenth (10th) day following service hereof or as soon thereafter as counsel maybe heard the undersigned counsel will move before the South Carolina Court of Appeals for an order relieving counsel of any further duty of Representation of the Appellant in the within matter.

Said Motion is made pursuant to the Rules of Court and is supported by the attached affidavit of counsel

***** SIGNATURE PAGE TO FOLLOW *****

Respectfully Submitted,

LAW OFFICE OF LAWRENCE KEITT

A handwritten signature in black ink, appearing to read "Lawrence Keitt", written over a horizontal line.

Lawrence Keitt, Esquire
340 Summers Avenue
P. O. Box 811
Orangeburg, SC 29116
(803) 531-2379

ATTORNEY FOR APPELLANT

February 28, 2019
Orangeburg, SC

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AFFIDAVIT OF COUNSEL

I, Lawrence Keitt being first duly sworn now depose and say that I was retained by Ms. Castro on April 3, 2018 to file an Appeal of the Magistrates decision. I charged her a fee of one thousand five hundred and no/100 dollars plus cost to represent her on the appeal of the Magistrate's decision. The Appellant paid eight hundred dollars on the fees and fifty dollars in cost on April 3, 2018. The Appeal was then duly and timely filed.

A hearing was held before Judge Whittle on April 19, 2018 wherein the Court set the Appellant's appeal bond at seven thousand five hundred and no/100 the amount of her arrears to her landlord and required she continue paying a monthly rental of two thousand five hundred and no/100 The Appellant failed to pay the bond or any additional rent to the landlord.

On May 30, 2018 the Appellant's appeal was heard by the Honorable R. Knox McMahon. On June 25, 2018 Judge McMahon's order affirming the Magistrate's decision was served upon me electronically. This order was sent to the Appellant by mail on June 26, 2018.

On July 2, 2018 I informed the Appellant during a telephone conversation that I did not think there was any appealable issues so I would not file a Motion to Reconsider Judge Knox's order. I also told her that we would take no further action because the remainder of my fee remained unpaid.

On July 6, 2018 the Appellant telephoned me and requested that I file the Motion to Reconsider. My office attempted to file the Motion on July 6, 2018 but it was not accepted by the Clerk's office until July 12, 2018.


The Appellant is now seeking to appeal because the Motion for Reconsideration was not timely filed. It should be noted that the time to file the Motion ended on July 5, 2018.

Obviously, the attorney client relationship is severed beyond repair. Thus, I would request the Court grant my Motion to be relieved in this matter.



Lawrence Keitt

SWORN AND SUBSCRIBED before me
This 2nd day of February 2019.



Notary Public for the State of South Carolina
My Commission Expires: November 19, 2025

Law Office of Lawrence Keitt

ATTORNEY AT LAW
P.O. Box 811
340 SUMMERS AVENUE
ORANGEBURG, SOUTH CAROLINA 29116

TELEPHONE (803) 531-2379
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LAWRENCE KEITT

The Honorable Jenny Abbott Kitchings
S.C. Court of Appeals
Post Office Box 11629
Columbia, SC 29211

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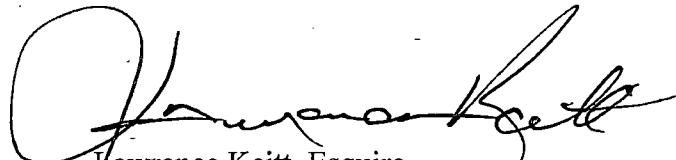
Re: Judi Castro v. Bryan Walling
Appellate Case No.: 2018-002134

Dear Ms. Kitchings:

Enclosed to be filed are the Appellant's Initial Brief and Designation of Matters, A Motion to Expand Time to allow the filing of the brief and a Motion to be Relieved as counsel for the Appellant. I am also enclosing my firm check in the amount of \$100.00 for the filing of the two Motions.

I would ask that one copy of each document be returned to me in the envelope enclosed for your convenience.

Sincerely,


Lawrence Keitt, Esquire

cc: Holly Marie Sarvis-Patterson, Esquire
Judi Castro

LK/lrb

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LUDED*
D*

Law Office of Lawrence Keitt
ATTORNEY AT LAW

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ORANGEBURG, SOUTH CAROLINA 29116

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