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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

Court of Common Pleas, Spartanburg County  
Honorable J. Derham Cole, Circuit Judge

Circuit Court Case No. 2011-CP-42-02079  
Appellate Case No.: 2019-000852

**RECEIVED**  
JUN 03 2019  
SC Court of Appeals

The Revocable Trust Agreement of  
Manning Lee Williams dated October 28, 2015 .....Respondent,

vs.

Cynthia Norden and Raymond Norden, .....Appellants.

MOTION TO SUBSTITUTE COUNSEL

I, Eleanor Jean Campbell Williams, as Trustee of the Revocable Trust Agreement of  
Manning Lee Williams dated October 28, 2015, have retained the services of Richard H. Rhodes,  
Esquire for purposes of the above pending appeal. I am requesting that John B. White, Jr.,  
Esquire be relieved as my attorney of record and that Richard H. Rhodes, Esquire be appointed  
as attorney of record for the appeal.

*Eleanor Jean Campbell Williams*  
Eleanor Jean Campbell Williams, as  
Trustee of the Revocable Trust Agreement  
of Manning Lee Williams dated October 28, 2015

I CONSENT:

*John B. White, Jr.*  
John B. White, Jr., Esquire

I CONSENT:

*Richard H. Rhodes*  
Richard H. Rhodes, Esquire

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PROOF OF DELIVERY

This is to certify that on the 31<sup>st</sup> day of May, 2019, the undersigned, secretary to Richard H. Rhodes, Esq., served a copy of the MOTION TO SUBSTITUTE COUNSEL by depositing a copy of the same into the United States Mail, postage pre-paid and in the correct amount to the following:

J. Falkner Wilkes, Esquire  
114 Whitsett Street  
Greenville, SC 29601  
Counsel for Appellants

N. Douglas Brannon, Esquire  
P.O. Box 3254  
Spartanburg, SC 29304  
Trial Counsel for Appellants

John B. White, Jr., Esquire  
P.O. Box 3547  
Spartanburg, SC 29304  
Trial Counsel for Respondent

  
JO ANN CHAMPION

SWORN to before me this 31<sup>st</sup>  
day of May, 2019.

 (SEAL)  
NOTARY PUBLIC FOR SOUTH CAROLINA

My Commission Expires: 12/10/2025

BURTS TURNER & RHODES  
ATTORNEYS AT LAW

SAM BURTS (1907 - 1982)  
NOEL TURNER (1928 - 2011)  
RICHARD H. RHODES  
M. NOEL TURNER, III  
WILLIAM H. RHODES

260 NORTH CHURCH STREET  
SPARTANBURG, S.C. 29306  
PHONE: 864-585-8166  
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May 31, 2019

RECEIVED  
JUN 03 2019  
SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
Clerk, The South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: The Revocable Trust Agreement of Manning Lee Williams dated October 28, 2015 vs.  
Cynthia Norden and Raymond Norden  
Case No. 2011-CP-42-02079  
Appellate Case: 2019-000852

Dear Ms. Kitchings:

I have enclosed an original and six (6) copies of a Motion seeking to be substituted as counsel for the Respondent together with a check for the filing fee. I have also enclosed Proof of Service on all counsel.

If I need to supply additional information, please let me know.

Sincerely,

  
Richard H. Rhodes

RHR/jc  
Enc.

cc:

J. Falkner Wilkes, Esquire  
114 Whitsett Street  
Greenville, SC 29601  
Counsel for Appellants

N. Douglas Brannon, Esquire  
P.O. Box 3254  
Spartanburg, SC 29304  
Trial Counsel for Appellants

John B. White, Jr., Esquire  
P.O. Box 3547  
Spartanburg, SC 29304  
Trial Counsel for Respondent