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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM ORANGEBURG COUNTY  
Court of Common Pleas

Maite Murphy, Circuit Court Judge

Case No. 2019-CP-38-00655

**RECEIVED**

MAR 05 2020

SC Court of Appeals

Jacquita Funchess

Appellant

v.

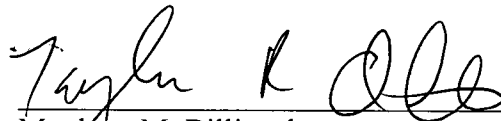
Glenfield Apartments

Respondent

**MOTION TO WITHDRAW AS COUNSEL**

Pursuant to Rule 264 I am the attorney of record until withdrawal is approved. This motion to withdraw is based on the retainer agreement of South Carolina Legal Services, which represents low income clients. The retainer agreement states that there must be further agreement in writing to represent a client for an appeal. Each request for representation on appeal would therefore be treated as a new case and application. Ms. Funchess is aware and discussed with Matthew M. Billingsley that South Carolina Legal Services would not represent her in an appeal of this case. Ms. Funchess is in agreement with this motion. Accordingly, we cannot represent her further. Pursuant to Rule 264 South Carolina Legal

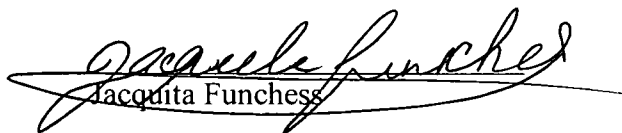
Services filed the Notice of Appeal for Ms. Funchess so that she may perfect her appeal. I request that Matthew M. Billingsley, Taylor Ott, and South Carolina Legal Services be allowed to withdraw as counsel and be relieved of further duties to Appellant.



Matthew M. Billingsley  
SC Bar #: 76095  
South Carolina Legal Services  
2803 Carner Avenue  
North Charleston, SC 29405  
(843) 266-2174 (843) 760-1090 (fax)  
Taylor Ott, S.C. Bar No. 100737  
P.O. Box 1646  
Orangeburg, South Carolina 29116  
Phone: 803-533-0116  
Fax: 803-533-0116

March 3, 2020

I consent to this motion and received a copy of this motion:



Jacquita Funchess

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CERTIFICATE OF SERVICE

I certify that I have served the Notice of Appeal and Motion to Withdraw on Glenfield Apartments by depositing a copy of it in the United States Mail, postage prepaid, on March 3, 2020, addressed to their attorney of record, Theodore von Keller, P.O. Box 4216 Columbia, SC 29204 .

March 3, 2020

SOUTH CAROLINA LEGAL SERVICES

s/Taylor Ott

By: Matthew M. Billingsley, S.C. Bar No. 76095

2803 Carner Avenue

North Charleston, SC 29405

(843) 266-2174

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P.O. Box 1646

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**South Carolina  
Legal Services**

*Balancing the Scales of Justice*

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[www.sclegal.org](http://www.sclegal.org) | [www.lawhelp.org/sc](http://www.lawhelp.org/sc) | [www.probono.net/sc](http://www.probono.net/sc)

March 3, 2020

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

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SC Court of Appeals

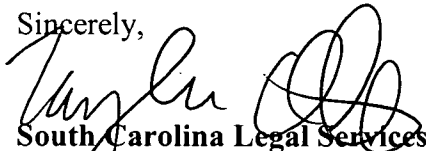
Re: Jacquita Funchess, Appellant v. Glenfield Apartments, Respondent

Dear Ms. Kitchings:

Please find the enclosed Notice of Appeal, Motion to Withdraw, Certificate of Service, copy of the Final Order being appealed, and the filing fee for the above referenced case.

With my kindest regards, I am

Sincerely,

  
**South Carolina Legal Services**  
Matthew M. Billingsley  
Taylor Ott  
Attorneys for Appellant

cc: Theodore von Keller

