

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

THE HONORABLE MIKELL R. SCARBOROUGH

Appellate Case No. 2019-001289

Raven's Run Homeowners Association, Inc., Appellant -Respondent,

V.

Crown Pointe Association, Inc., Lois K. Novak as Trustee of the Lois K. Novak Living Trust dated 10/14/2013; Laurie T. Herron and Mark D. Herron; James B. Kubu and Melissa F. Kubu; Leila June Johnson; Danny Ta and Anita McCauley; Robert E. Luby, Jr., and Barbara Luby; Joshua D. Coonce; Lucius Roy Junevicus; Katherine Kinlaw; Thomas K. Kuyk and Melissa Ward; Roland Franklin Wooten, III, and Teresa Key Wooten; Michael P. Horvath; Timothy E. Moylan and Karen G. Moylan; Carl A. Counasse and Maureen Counasse; David A. Frielinghaus and Holly C. Frielinghaus; Christopher S. Finley and Holly M. Finley; Shirley D. Springer a/k/a Shirley Deanna Springer; Deirdre C. Knight; Robert Shane Johnson; Eric R. Sigman; Lamar Graves, Jr. and Terry W. Graves; Mary Elizabeth Gladden; Philip Wallace and Naomi Grad; Thomas Edwin Davis and Luis Miguel Gonzalez Melchor; John R. Funkhouser and Jennifer L. Funkhouser; Gregory S. Cooper and Jane B. Cooper; Frank C. Jones, Jr. and Elise Ubele Jones; William P. Topping and Kris B. Topping; LaRhonda S. Ptichko; Kenneth L. Tully and Anna J. Tully, Defendants,

RECEIVED
JUN 11 2020
SC Court of Appeals

Of Whom James B. Kubu and Melissa F. Kubu and Leila June Johnson are the Respondents.

And Katherine Kinlaw is the Respondent-Appellant.

**RESPONDENT'S MOTION FOR RELIEF OF COUNSEL
MOTION TO HOLD TIMELINE IN ABEYANCE**

MOTION FOR RELIEF OF COUNSEL

Respondents, James and Melissa Kubu, move this Honorable Court for the Relief of Counsel, Edward K. Pritchard, Jr. pursuant to Rule 1, SCACR.

Respondents give consent to withdrawal and in support of their motion will show:

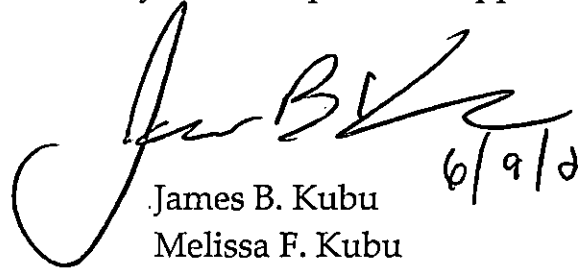
1. Mr. Pritchard provide clear written notice of his intent to retire.
2. Mr. Pritchard provided written notification to the court on October 1, 2019.
3. Clerk of Court sent notification of receipt of request to withdrawal representation on November 1, 2019

MOTION TO HOLD TIMELINE IN ABEYANCE

Respondents move this Honorable Court for an Abeyance of the Timelines set forth in Rule 240 SCACR. Respondents are currently without representation in this matter and will Show:

1. Previous attorney Edward K. Pritchard as of this date had not obtained an order relieving him from representation or filed a motion to be relieved as counsel with this Court, pursuant to Rule 264 SCACR.
2. To this date there exists no Oder by the Appellate Court terminating representation by Mr. Pritchard.
3. Do to current Covid-19 restrictions and despite respondents' diligent efforts, respondents remain without representation.
4. The Abeyance of this Timeline is needed to give respondents time to seek necessary counsel, provide time for future counsel to become familiar with the record and to allow counsel time to draft and adequately answer Appellant, Ravens Run Initial Brief, which was filed on January 23, 2020.

WHEREFORE, having fully set forth-the grounds for the Motion, Respondents move for an Order granting Relief of Counsel and Abeyance of Timeline enabling respondents the ability to file response to Appellants Initial Brief.



6/9/2020

James B. Kubu
Melissa F. Kubu
Pro Se

1514 Diamond Blvd.
Mount Pleasant, SC 29466
843-810-4667

Other Counsel of Record:

William W. Wilkins
Kirsten Elena Small
Nexsen Pruet, LLC
55 E. Camperdown Way
Greenville, SC 29601
Attorneys for Appellant-Respondent, Raven's Run

George Hamlin O'Kelley, III
Buist, Byars & Taylor, LLC
652 Coleman Blvd., Suite 200
Mt. Pleasant, SC 29464
(843)856-4488
Attorneys for the Appellant-Respondent, Raven's Run

Harold A. Oberman
Oberman & Oberman, LLC
60 Markfield Drive, Suite 2
Charleston, SC 29407
(843)577-7010
Attorney for Respondent-Appellant, Katherine Kinlaw

Jeffrey T. Spell
1721 Ashley River Road Charleston, SC 29407
(843) 452-3353
Attorney for Leila (JUNE) Johnson

CERTIFICATE OF SERVICE

I Certify that I have served the foregoing **Respondent's Motion for Relief of Counsel and Respondent's Motion for Abeyance of Timelines** on all Appellant/Respondents and Respondents by sending one copy of it in the United States Mail on June 9, 2020 to the attorneys of record.

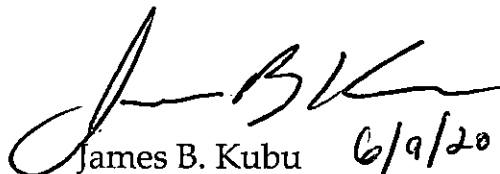
William W. Wilkins
Kirsten Elena Small
Nexsen Pruet, LLC
55 E. Camperdown Way
Greenville, SC
29601
Attorneys for Appellant-Respondent, Raven's Run

George Hamlin O'Kelley, III
Buist, Byars & Taylor; LLC
652 Coleman Blvd., Suite 200
Mt. Pleasant, SC 29464
Attorneys for the Appellant-Respondent, Raven's Run

Harold A. Oberman
Oberman & Oberman, LLC
60 Markfield Drive, Suite 2
Charleston, SC 29407
Attorney for Respondent-Appellant, Katherine Kinlaw

Jeffrey T. Spell
1721 Ashley River Road
Charleston, SC 29407
Attorney for Leila (JUNE) Johnson

RECEIVED
JUN 11 2020
SC Court of Appeals


James B. Kubu 6/9/2020

Melissa F. Kubu

Pro Se

1514 Diamond Blvd.

Mount Pleasant, SC 29466

843-810-4667

UNITED STATES
POSTAL SERVICE

P **P** **R** **E** **S** **S** **P** **R** **I** **O** **R** **I** **T** **Y** **®**

UNITED STATES POSTAL SERVICE Retail

US POSTAGE PAID \$7.75
Origin: 29431
09/09/20
4542200451-12

PRIORITY MAIL 2-DAY[®]

0 Lb 2.70 Oz 1006

EXPECTED DELIVERY DAY: 08/12/20

SHIP TO: **B012**
PO BOX 11629
COLUMBIA SC 29211-1629

USPS TRACKING[®] NUMBER

9505 5105 8197 0161 5047 92

FROM: KURBU
1614 DIAMOND BLVD.
MT. PLEASANT, SC
29406

RECEIVED

JUN 11 2020

SC Court of Appeals TO:

CLERK OF COURT
P.O. BOX 11629
COLUMBIA, SC 29211

To schedule free
Package Pickup,
scan the QR code.



USPS.COM/PICKUP

* Domestic only. * For Domestic shipments, the maximum weight is 70 lbs. For International shipments, the maximum weight is 4 lbs.

This envelope is made from post-consumer waste. Please recycle ♻️

This packaging is the property of the U.S. Postal Service[®] and is provided solely for use in sending Priority Mail[®] shipments. Pieces may be a violation of federal law. This packaging is not for resale. EPIAF © U.S. Postal Service/October 2018. All rights reserved.