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Apr 19 2021

**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

SC Court of Appeals

**APPEAL FROM GREENVILLE COUNTY
Charles B. Simmons, Jr., Master in Equity**

Civil Action No. 2017-CP-23-06301 Appellate Case No. 2018-001209

Raymond Wedlake, individually, and derivatively, on behalf of all Members of the
Woodington Homowners' Association, Inc., Appellant,

v.

Benjamin Acord, William Craigo, Denis Esteve, and Brian James in their capacity as
the current Board of Directors of the Woodington Homeowners' Association, Inc., and
Association Management Group, Respondents.

**POST-DECISION MOTION TO BE RELIEVED AS COUNSEL OF RECORD FOR
APPELLANT**

Grant H. Gibson, Esq.
SC Bar No. 9269
G. Gibson & Associates, LLC
661 W. Johns Creek Parkway
St. Augustine, FL 32092
Tel: (864) 630-7471
atty@ggibsonassociates.com
Counsel for Appellant

Comes Now, Grant H. Gibson, Esq., Counsel of Record for Appellant: Raymond A. Wedlake, in the above-captioned matter, and, pursuant to Rule 11(b) of the SCRCP, would respectfully file this motion requesting to be relieved as counsel of record. Such Motion is based upon Appellant's request for the undersigned to withdraw, and is Post-Appellate Court decision in the Case. More specifically, as set forth in the attached Exhibit A letter from Appellant, such Motion is based upon Appellant's desire for counsel to be readily available in Greenville, SC, and the fact that undersigned counsel now resides in St. Augustine, FL, which precludes such ready availability. Movant further states that he has advised counsel for Defendant: Ely O. Grote, Esq., of McCabe, Trotter & Beverly, P.C., who is receiving service of this motion, as to his intent to withdraw and to this motion to withdraw.

Counsel for Appellant impressed upon Appellant the value and benefit of having counsel arranged at the time of withdrawal, and his willingness to remain until such counsel is found. Movant was told by Appellant that he is aware of the foregoing. Appellant stated that should he decide to do so, he is able and willing at this time to proceed with this case *Pro Se*. Thus, Movant, per the request of Appellant, respectfully requests this Court's permission to withdraw as counsel of record in the above-captioned case.

April 19, 2021

Respectfully Submitted:

s/ Grant H. Gibson

Grant H. Gibson, Esq.
G. Gibson & Associates, LLC
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661 W. Johns Creek Parkway
St. Augustine, FL 32092
Tel: (864) 630-7471
atty@ggibsonassociates.com

703 Creekview Drive
Greenville, SC 29607
April 13, 2021

Grant H. Gibson, Esq.
661 W. Johns Creek Parkway
St. Augustine, FL 32092

**Re: Client Request to Withdraw as Legal Counsel - Motion to be Relieved as Counsel
of Record: 2018 - 001209**

Dear Mr. Gibson:

Per our discussions, I have asked you to withdraw as my legal counsel, while at the same time I commend you on your move to Florida, in advance of retirement, after nearly 50-years of active practice.

Accordingly, please send a "Motion to be Relieved as Counsel of Record for Appellant" to the Court of Appeals. COA motion-filing fee is \$50. My understanding is that per Rule 11(b), SCRCF, you must file a Motion with the Clerk asking for an Order that you be relieved. .

Sincerely,



Raymond A. Wedlake 864-254-9262
wedlakera@mail.com

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Charles B. Simmons, Jr., Master in Equity

Civil Action No. 2017-CP-23-06301 Appellate Case No. 2018-001209

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Woodington Homowners' Association, Inc., Appellant,

v.

Benjamin Acord, William Craigo, Denis Esteve, and Brian James in their capacity as
the current Board of Directors of the Woodington Homeowners' Association, Inc., Respondents.

CERTIFICATE OF SERVICE

It is hereby certified that a copy of "Motion to be Relieved as Counsel of Record
for Appellant", was served upon the following:

Ely O. Grote, Esq.- Attorney for Respondents
McCabe Trotter & Beverly, PC
P.O. Box 212069
Columbia, SC 29221
Tel: (803) 724-5000
ely.grote@mccabetrotter.com

via electronic mail (e-mail), and First Class Mail, on April 19, 2021.

s/ Grant H. Gibson

Grant H. Gibson, Esq. (SC Bar # 9269)
G. Gibson & Associates, LLC
661 W. Johns Creek Parkway
St. Augustine, FL 32092
Tel: (864) 630-7471
atty@ggibsonassociates.com
Counsel for Appellant

G. Gibson & Associates, LLC

Grant H. Gibson, Esq.
661 W. Johns Creek Pkwy.
St. Augustine, Florida 32092
Cell: 864-630-7471
Fax: 866-667-2509
atty@ggibsonassociates.com

April 18, 2021

BY: PRIORITY MAIL

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

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SC Court of Appeals

**Re: Raymond A. Wedlake v. Benjamin Acord, et al
Appellate Case No. 2018-001209
Common Pleas Case No. 2017-CP-23-6301
Transmittal of Motion to Withdraw**

Dear Ms. Kitchings:

Although your Court of Appeals recently decided the above-captioned Appeal, I am transmitting a Motion to Withdraw as Counsel of Record for Appellant, Mr. Raymond A. Wedlake, per his request (enclosed).

Please note that we have copied Appellee Counsel, Ely Grote, Esq., whom we recently advised of such Motion, and have provided him with a copy of such Motion.

Thank you!

Respectfully submitted,

GRANT H. GIBSON, ESQ.
Counsel for Appellant – Raymond Wedlake

/s/ Grant H. Gibson

Grant H. Gibson, Esq. Bar #: 0009269
661 W. Johns Creek Pkwy.
St. Augustine, Fl. 32092
Tel: (864) 630-7471
atty@ggibsonassociates.com

Enc. CK # 262
\$50 Filing Fee

cc. Ely Grote (via First-Class U.S. Priority Mail)

GRANT H GIBSON ESQ
661 W JOHNS CREEK PKWY
ST AUGUSTINE, FL 32092-5076

202

63-751/631 11035

April 19, 2021
Date

Pay to the
Order of

S.C. Court of Appeals - Check of Cash \$ 50.00

Fifty

00/100

Dollars



Wells Fargo Bank, N.A.
Florida
wellsfargo.com

Monetary Withdrawal

For: App Court # 2018-001-209

[Handwritten Signature]

MP

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Halifax Clarke

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