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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APR 20 2021

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

**SC Court of Appeals**

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](mailto: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  
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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*

Raymond A. Wedlake 864-254-9262  
[wedlakera@mail.com](mailto:wedlakera@mail.com)

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APPEAL FROM GREENVILLE COUNTY  
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**SC Court of Appeals**

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., 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](mailto:atty@ggibsonassociates.com)  
Counsel for Appellant

***G. Gibson & Associates, LLC***

Grant H. Gibson, Esq.  
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Cell: 864-630-7471  
Fax: 866-667-2509  
[atty@ggibsonassociates.com](mailto: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

**RECEIVED**  
APR 20 2021  
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](mailto:atty@ggibsonassociates.com)

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

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SC Court of Appeals

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