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Jul 28 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J. Mark Hayes, II, Circuit Court Judge

APPELLATE CASE NO. 2019-000076

Case No. 2017-CP-10-03110
(formerly Probate Court Case No. 2010-ES-10-00413)

CAROL MANIGAULT,

Appellant,

v.

MORRIS ELLISON, AS PERSONAL
REPRESENTATIVE OF THE ESTATE
OF ANDREW MANIGAULT,

Respondent.

MOTION TO WITHDRAW AS COUNSEL

COME NOW, Karen M. DeJong, Esq. of the DeJong Law Firm, LLC, attorney of record for Appellant Carol Manigault and pray this Court to enter its' Order granting leave to withdraw as counsel for Appellant Carol Manigault, and as grounds therefore would show the Court:

1. On September 27, 2020, the Appellant, Carol Manigault, passed away intestate in Bergen County, New Jersey.
2. Appellant's brother, Kenneth E. Walker, was granted Letters of Administration on January 29, 2021 by the Bergen County Surrogate's Court, Docket No. 2021-0252 for Appellant's Estate.

3. Kenneth E. Walker, Administrator of Appellant's Estate, has informed Karen M. DeJong, Esq., that he no longer wishes to have her or her law firm represent the Appellant's Estate in this matter.

4. As of today's date, Kenneth E. Walker, Administrator of Appellant's Estate, has not hired new counsel to serve as the Estate's attorney in this matter.

5. Karen M. DeJong, Esq. and the DeJong Law Firm, LLC have been directed to cease all representation and to withdraw as counsel for Appellant Carol Manigault.

6. The undersigned provides the attached Certification that this Motion has been served on Kenneth E. Walker, Administrator of Appellant's Estate today.

Dated: July 28, 2021

DeJong Law Firm, LLC

By: s/Karen M. DeJong
Karen M. DeJong, Esq.
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Attorney for Appellant

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PROOF OF SERVICE

I certify that I have served the Motion to Withdraw as Counsel for Appellant, by e-filing and first class mail, on July 28, 2021, addressed to Appellant's Estate Administrator, Kenneth E. Walker, 1120 Westfield Drive, Oxon Hill, MD 20745; Kenneth E. Walker's estate attorney, Grace C. Bertone, Esq., Bertone & Piccini, LLP, 777 Terrace Avenue, Suite 201, Hasbrouck Heights, NJ 07604; and Respondent's attorney of record, James D. Myrick, Esq., Womble Bond Dickinson, LLP, 5 Exchange Street, Charleston, SC 29402.

Dated: July 28, 2021

DeJong Law Firm, LLC

By: s/Karen M. DeJong
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