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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas
J. Cordell Maddox Jr., Circuit Court Judge

Case No.: 2015-CP-04-01518
Appellate Case No. 2020-001253

Deutsche Bank National Trust
Company, as Certificate Trustee on
behalf of Bosco Credit II Trust Series
2010-1,Respondent,

v.

Doris J. Dixon and AnMed Health, Defendants,
Of whom Doris J. Dixon is the Appellant.

**MOTION TO BE RELIEVED AS COUNSEL
FOR RESPONDENT**

Kevin T. Brown (SC Bar # 64236)
Scott and Corley, P.A.
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Andrew W. Montgomery (SC Bar # 79893)
Bell Carrington & Price, LLC
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Attorneys for the Respondent Deutsche Bank National Trust Company, as Certificate Trustee on
behalf of Bosco Credit II Trust Series 2010-1

Kevin T. Brown, Esquire, Erica G. Lybrand, Esquire, Robert P. Davis, Esquire, and Andrew W. Montgomery, Esquire, respectfully move pursuant to Rule 264(b), SCACR, to be relieved as counsel for Respondent Deutsche Bank National Trust Company, as Certificate Trustee on behalf of Bosco Credit II Trust Series 2010-1 (“Respondent”) in this appeal on the following grounds:

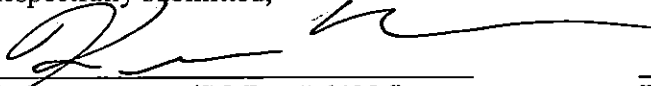
Mr. Brown, Ms. Lybrand, Mr. Davis, and Mr. Montgomery previously worked at the law firm currently representing Respondent in this case (Rogers Townsend LLC) and each served as foreclosure counsel of record for Respondent at various points in the lower court proceedings. Each has since departed Rogers Townsend LLC, and none of them have had any involvement in the handling of this appeal. Mr. Brown now works at Scott and Corley, PA, Ms. Lybrand now works at Blair Cato Pickren Casterline, LLC, Mr. Davis now works at Chicago Title Insurance Company, and Mr. Montgomery now works at Bell Carrington & Price, LLC.

Respondent will continue to be represented in this appeal by Sean M. Foerster, Esquire, who consents to relieving these attorneys as counsel of record for Respondent in this appeal.

WHEREFORE, Mr. Brown, Ms. Lybrand, Mr. Davis, and Mr. Montgomery respectfully request an Order of the Court relieving each of them as counsel for Respondent in this appeal.

[signatures on the following pages]

Respectfully submitted,




Kevin T. Brown (SC Bar # 64236)
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I CONSENT:



Sean M. Foerster (SC Bar # 77466)
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(803) 771-7900
sean.foerster@rogerstownsend.com

Attorneys for the Respondent Deutsche Bank National Trust Company, as Certificate Trustee on behalf of Bosco Credit II Trust Series 2010-1

Respectfully submitted,

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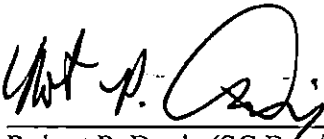
I CONSENT:

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Attorneys for the Respondent Deutsche Bank National Trust Company, as Certificate Trustee on behalf of Bosco Credit II Trust Series 2010-1

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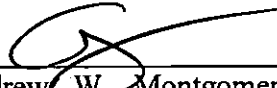
Attorneys for the Respondent Deutsche Bank National Trust Company, as Certificate Trustee on behalf of Bosco Credit II Trust Series 2010-1

Respectfully submitted,

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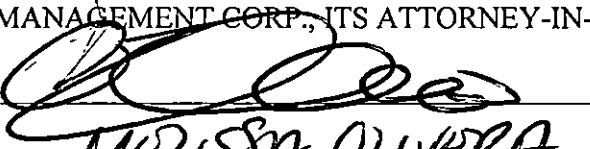
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Attorneys for the Respondent Deutsche Bank National Trust Company, as Certificate Trustee on behalf of Bosco Credit II Trust Series 2010-1

I consent to the withdrawal of Kevin T. Brown, Esquire, Erica G. Lybrand, Esquire, Robert P. Davis, Esquire, and Andrew W. Montgomery, Esquire, as counsel for Respondent in this case:

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS CERTIFICATE TRUSTEE ON BEHALF OF BOSCO CREDIT II TRUST SERIES 2010-1, BY AND THROUGH FRANKLIN CREDIT MANAGEMENT CORP., ITS ATTORNEY-IN-FACT

Signature:



Print Name:

MELISSA OLIVERA

Title:

FORECLOSURE MANAGER, ANP

Date Executed:

7/30/2021

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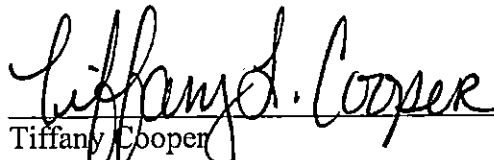
PROOF OF SERVICE

I HEREBY CERTIFY that I have served the Motion to Be Relieved as Counsel for
Respondent on August 9, 2021, on the following parties/counsel of record:

Via email:
Deutsche Bank National Trust
Company, as Certificate Trustee on
behalf of Bosco Credit II Trust Series
2010-1
c/o Melissa Olivera
Franklin Credit Management Corp.
101 Hudson Street, 24th Floor
Jersey City, NJ 07302

Via regular mail:
Howard W. Anderson, III, Esquire
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P.O. Box 661
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Tiffany Cooper
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LICENSED IN SOUTH CAROLINA



August 9, 2021

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court for the South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

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RE: *Deutsche Bank National Trust Company, as Certificate trustee on behalf of
Bosco Credit II Trust Series 2010-1 v. Doris J. Dixon; Anmed Health*
Appellate Case No. 2020-001253
Our File #: 510023.00200

Dear Ms. Kitchings:

Enclosed are the original and seven copies of a Motion to Be Relieved as Counsel for Respondent and a Proof of Service in reference to the above-listed matter, along with a check in the amount of \$50.00.

By copy of this correspondence, I am serving a copy of this motion on our client and on the counsel of record in this appeal.

At your convenience, please return a filed copy of this document to me in the enclosed prepaid envelope.

Very truly yours,

A handwritten signature in black ink, appearing to read "Sean M. Foerster", is written over a horizontal line.

Sean M. Foerster

/SMF
Enclosures

cc:
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