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RECEIVED

Jan 27 2022

SC Court of Appeals

January 27, 2022

VIA E-MAIL

Hon. Jenny Abbott Kitchings
SC Court of Appeals
1220 Senate Street
Columbia, SC 29201
ctappfilings@sccourts.org

RE: *Kenneth F. Brown and Renee B. Brown v. Teresa L. Waldrop*
Appellate Case No. 2021-000854
SHL No. 2861.0001

Dear Madam Clerk:

We wanted to write the Court to briefly respond to Teresa Waldrop's submissions and other correspondence with the SC Court of Appeals in opposition to our Motion to be Relieved as her Counsel filed on December 15, 2021.

Ms. Waldrop's representations to the Court concerning our attempts to contact her prior to informing her of our termination of representation are not factually accurate. Due to the privileged nature of those communications we cannot disclose them in detail; however, we thought it necessary to apprise the Court that the representations made by Ms. Waldrop concerning them are inaccurate.

Finally, the fact that Ms. Waldrop is contesting our Motion we believe provides further and important grounds for its approval by the Court. There is an irreparable rift between counsel and a client who wants to force her counsel to continue representation when they have made the decision that they need to terminate.

We appreciate the Court's consideration of our Motion and this correspondence.

Thank you for your attention to this matter. If you have any question or issues, please do not hesitate to contact me.

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With kind regards, I am,

Sincerely,

SMITH HUDSON LAW, LLC



Joseph O. Smith

cc: Ronald Clement, Esq.
Teresa Waldrop