

IN THE SUPERIOR COURT OF LOWNDES COUNTY
STATE OF GEORGIA

TELVIN SMITH,
Plaintiff,

VS.

DECICHEI SIMMS,
Defendant.

:
:
: CIVIL ACTION
: FILE NO. 2018CVD0765
:
:

MOTION FOR WITHDRAWAL AS COUNSEL

COMES NOW ELIZABETH GREEN LINDSEY, and the law firm of Davis, Matthews & Quigley, P.C., attorneys for Telvin Smith, Plaintiff above, and respectfully requests the Court to allow them to withdraw as counsel in this matter. Counsel hereby certifies TELVIN SMITH, Plaintiff above, has been notified, pursuant to the attached Exhibit "A", that: (1) the case is still pending in Lowndes County Superior Court; (2) that counsel and Davis, Matthews & Quigley, P.C. intend to withdraw; (3) that this court retains jurisdiction of this action; (4) that he has the burden of keeping the court informed respecting where notices, pleadings, or other papers may be served upon him; (5) that he has the obligation to prepare for trial or hire other counsel to prepare for trial when the trial date has been set; (6) that if he fails or refuses to meet these burdens, his case may suffer adverse consequences including dismissal; (7) that the holding of any scheduled proceedings will not be affected by the withdrawal of counsel; (8) that service of notices may be made upon Plaintiff at his last known address, and (9) that he has the right to object within ten (10) days of the date of the Notice of Withdrawal of Counsel. Plaintiff's last known physical address, telephone number and e-mail address are as follows: Telvin Smith, 782 Shipwatch Drive East,

Jacksonville, FL 32225-5407; Telephone number: (229) 412-2298; e-mail address:
telvinsmithjags50@icloud.com. This notification to Plaintiff was made pursuant to Uniform
Superior Court Rule 4.3.

For the above and foregoing reasons, ELIZABETH GREEN LINDSEY, and the law firm
of Davis, Matthews & Quigley, P.C. respectfully request that this Court permit their withdrawal
from further representation of TELVIN SMITH, Plaintiff.

This the 18th day of March, 2019.

DAVIS, MATTHEWS & QUIGLEY, P.C.



ELIZABETH GREEN LINDSEY

State Bar No. 453077

elindsey@dmqlaw.com

Attorneys for Plaintiff

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COURT ORDER PERMITTING ATTORNEY TO WITHDRAW

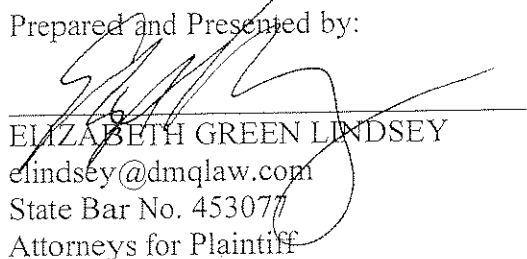
The motion of ELIZABETH GREEN LINDSEY and the law firm of Davis, Matthews & Quigley, P.C. to withdraw as Attorneys for Plaintiff having been presented in conformity with Uniform Superior Court Rule 4.3 and after reviewing the same, there being no objection, it is hereby ORDERED that the motion is GRANTED and that all future notices and pleadings shall be served upon TELVIN SMITH at his address that the Clerk of Court, upon this direction, will designate in the record as:

Mr. Telvin Smith
782 Shipwatch Drive East
Jacksonville, FL 32225-5407
Telvinsmithjags50@icloud.com

This ____ day of _____, 2019.

THE HONORABLE
JUDGE, SUPERIOR COURT OF LOWNDES COUNTY

Prepared and Presented by:



ELIZABETH GREEN LINDSEY
elindsey@dmqlaw.com
State Bar No. 453077
Attorneys for Plaintiff

Andrea M. Iaderosa

From: Andrea M. Iaderosa
Sent: Friday, March 8, 2019 6:12 PM
To: 'telvinsmithjags50@lcloud.com'
Cc: Elizabeth Lindsey; Matthew J. Johnson
Subject: Telvin Smith v. Dacchei Simms - Superior Court of Lowndes County Case No. 2018CVD0765
Attachments: Smith, Telvin - Ltr to T. Smith re Withdrawal as Counsel.pdf; Smith, Teivin - Motion to Withdraw as Counsel.pdf; Smith, Telvin - Court Order Permitting Attorney to Withdraw.pdf

Good afternoon Mr. Smith,

Attached above as PDFs regarding your domestic relations matter are the following documents:

1. Letter from Elizabeth Lindsey regarding withdrawal as counsel;
2. Motion for Withdrawal as Counsel (draft); and
3. Court Order Permitting Attorney to Withdraw.

Please let me know if you have any questions, or if you are unable to open/read any of the attached documents. Thank you.

Sincerely,

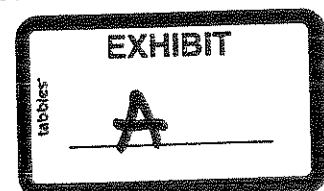
Andrea Iaderosa

*Andrea Iaderosa
Legal Administrative Assistant
Davis, Matthews & Quigley, P.C.
3400 Peachtree Road, NE, Suite 1400
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DAVIS, MATTHEWS
- & QUIGLEY, P.C. -
ATTORNEYS AT LAW

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DISCLOSURE: Any tax advice contained in this e-mail or any attachment hereto is not intended to be used, and cannot be used, to avoid penalties imposed under the internal Revenue Code.



DAVIS, MATTHEWS & QUIGLEY, P.C.

ATTORNEYS AT LAW
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SUITE 1400
ATLANTA, GEORGIA
30326

404/261-3900
FAX NUMBER: 678/964-3169

e-mail: clindsey@dmqdlaw.com

ELIZABETH GREEN LINDSEY


March 8, 2019

VIA E-MAIL & U.S. MAIL

Mr. Telvin Smith
782 Shipwatch Drive East
Jacksonville, FL 32225-5407
Telvinsmithjags50@icloud.com

Re: Telvin Smith v. Dacchei Simms
Civil Action File No.: 2018CVD0765
Lowndes County Superior Court

Dear Telvin,

 Since my firm is withdrawing from further representation, I must inform you of several requirements:

- a. The Lowndes County Superior Court retains jurisdiction of the above-styled action;
- b. This case is still pending in Lowndes County Superior Court;
- c. You have the burden of keeping the Court informed respecting where notices, pleadings, or other papers may be served upon you. In that regard, I have provided the Court with your last known address, 782 Shipwatch Drive East, Jacksonville, FL 32225-5407, and e-mail address: telvinsmithjags50@icloud.com;
- d. You have the obligation to prepare for trial and hearings, or hire other counsel to prepare for trial when the trial date has been set;

Mr. Telvin Smith.

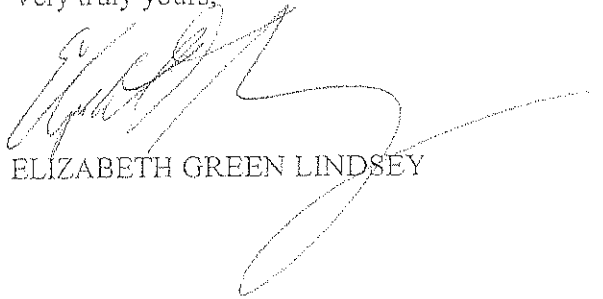
March 8, 2019

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- e. If you fail or refuse to meet these burdens, our case may suffer adverse consequences including dismissal;
- f. The scheduling of any proceedings will not be affected by our withdrawal;
- g. Services of notices will be forwarded to you at your last known address. Please note that the Lowndes County Superior Court requires an e-file account if you have an e-mail address.
- h. If you do not consent to the withdrawal, you have the right to object within ten (10) days of the date of this letter; and
- i. If you consent to the withdrawal, please sign and return the original Order to us. The proposed Order is enclosed for your reference.

With best wishes, I am,

Very truly yours,



ELIZABETH GREEN LINDSEY

EGL/mjj

cc: Matthew J. Johnson, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion for Withdrawal as Counsel* has been served on the assigned Judge, opposing counsel of record and TELVIN SMITH by Statutory Electronic Service and by depositing in the United States Mail a copy of same in a properly addressed envelope with adequate postage thereon to:

B. Miles Hannan, Esq.
Smith, Hannan & Parker, P.C.
610 N. Patterson Street
PO Box 5408
Valdosta, Georgia 31603-5408
mhannan@shplaw.com

Telvin Smith
782 Shipwatch Drive East
Jacksonville, FL 32225-5407
Telvinsmithjags50
@icloud.com

This the 15th day of March, 2019.

DAVIS, MATTHEWS & QUIGLEY, P.C.


ELIZABETH GREEN LINDSEY
State Bar No. 453077
elindsey@dmqlaw.com
Attorneys for Plaintiff