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Jul 20 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas for the Ninth Judicial Circuit

The Honorable Bentley Price, Circuit Court Judge

Case Number: 2019-CP-10-00178
App. No. 2020-000925

J. DANIEL MAHONEY Plaintiff/Respondent,

v.

THE MUHLER COMPANY, INC. and HENRY M. HAY, III Defendants/Appellants.

CONSENT MOTION TO SUBSTITUTE COUNSEL

COMES NOW undersigned Counsel and files this Motion—with consent of Appellants and Respondent—to be relieved as counsel of record for Appellants The Muhler Company, Inc. and Henry M. Hay, III, pursuant to Rule 264, SCACR, on the grounds that Ellis R. Lesemann, Esquire and Benjamin H. Joyce, Esquire of Lesemann & Associates, LLC will be substituted as counsel for Appellants The Muhler Company, Inc. and Henry M. Hay, III, and the undersigned counsel's withdrawal will not affect the appeal of this matter.

THEREFORE, the undersigned attorneys request that Jaan Gunnar Rannik, Esquire of Epting & Rannik, LLC be relieved of all duties of representation with respect to the above-captioned matter and request that Ellis R. Lesemann, Esquire and Benjamin H. Joyce, Esquire of Lesemann & Associates LLC be made counsel of record and that all future correspondence, notices, and pleadings be made to their attention.

July 20, 2022
Charleston, South Carolina

Respectfully submitted:

EPTING & RANNIK, LLC

/s/ Jaan Rannik

Jaan G. Rannik, Esq.
SC Bar No. 103104
46A State Street
Charleston, SC 29401
Phone: (843) 377-1871
jgr@epting-law.com

Prior Attorney for Appellants

We so consent:

s/ Ellis R. Lesemann

Ellis R. Lesemann, Esquire
SC Bar No. 15315
erl@lalawsc.com
Benjamin H. Joyce, Esquire
SC Bar No. 100494

bhj@lalawsc.com

LESEMANN & ASSOCIATES LLC
418 King Street, Suite 301
Charleston, SC 29403
(843) 724-5155

***Substituted Attorneys for
Defendants/Appellants***

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APPEAL FROM Charleston COUNTY
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Case No.: 2019-CP-10-00178
App. No. 2020-000925

J. DANIEL MAHONEY.....Plaintiff / Respondent,

v.

THE MUHLER COMPANY, INC. and HENRY M. HAY, III, in his individual capacity,
Defendants/Appellants.....Defendants / Appellants.

PROOF OF SERVICE

I certify that I have served the Consent Motion to Substitute Counsel dated July 20, 2022 on all counsel via e-mail, on July 20, 2022, addressed to the following:

Clay McCullough, Esq., at clay@mklawsc.com.
Ellis R. Lesemann, Esq. at erl@lalawsc.com
Benjamin H. Joyce, Esq. at bhj@lalawsc.com

A copy of the e-mail is attached to this Proof of Service as Exhibit A.

EPTING & RANNIK, LLC

By /s/ Angela Gross

Angela Gross
Legal Assistant to
Jaan G. Rannik
46A State Street, Charleston, SC 29401
Phone: 843-377-1871; Fax: 843-377-1310

EXHIBIT A

Angela Gross

From: Angela Gross
Sent: Wednesday, July 20, 2022 11:02 AM
To: Clayton B. McCullough (CLAY@MKLAWSC.COM)
Cc: 'Ellis Lesemann'; 'bhj@lalawsc.com'; Andrew K. Epting; Jaan Rannik
Subject: Mahoney v. Muhler et al / Appeal No. 2020-000925
Attachments: 2022 07 20 - Ltr to Ct. App with fee for Consent Order for Substitution of Counsel (2020-000925).pdf;
2022 07 20 - Consent Motion to Substitute Counsel (Mahoney v. Muhler - App. No. 20-0000925).pdf

Counsel,

Attached for service please find the Consent Motion to Substitute Counsel in the above referenced appeal.

A Proof of Service will follow under separate cover email.

With kindest regards,



Angela Gross
Legal Assistant to Andrew K. Epting, Jr., Esq.
Jaan G. Rannik, Esq.
Clinton T. Magill, Esq.
EPTING & RANNIK, LLC
46A State Street
Charleston, SC 29401
Telephone: (843) 377-1871
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EPTING & RANNIK

ATTORNEYS AT LAW

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JAAN G. RANNIK · JGR@EPTING-LAW.COM

CLINTON T. MAGILL · CTM@EPTING-LAW.COM

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SC Court of Appeals

July 20, 2022

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RE: *J. Daniel Mahoney v. The Muhler Company, Inc. and Henry M. Hay, III*
Case No.: 2019-CP-10-00178
App. No.: 2020-000925

Dear Ms. Kitchings:

Enclosed is our firm's check for \$50.00 as the fee associated with the Consent Order for Substitution of Counsel which was electronically filed today in the above-referenced appeal.

With kind regards,

EPTING & RANNIK, LLC



Angela Gross
Legal Assistant to Jaan G. Rannik

/agg

Enclosures – as stated

cc: Clay McCullough, Esquire
Ellis R. Lesemann, Esquire
Benjamin H. Joyce, Esquire