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Jul 14 2022

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Charleston County
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge

Case No. 2019-CP-10-01434
Appellate Case No. 2019-001910

David Abdo,

Appellant,

v.

City of Charleston and
Board of Zoning Appeals-Zoning,

Respondents.

**(1) NOTICE OF APPEARANCE OF ATTORNEY HINES
AS ADDITIONAL COUNSEL FOR RESPONDENTS AND (2) MOTION TO
WITHDRAW ATTORNEY MCQUEENEY AS COUNSEL FOR RESPONDENTS**

CLEMENT RIVERS, LLP
Wilbur E. Johnson (SC Bar No. 3062)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
wjohnson@ycrlaw.com
rhines@ycrlaw.com
(843) 720-5488

and

Julia P. Copeland (SC Bar No. 77199)
CITY OF CHARLESTON
Legal Department
50 Broad Street
Charleston, South Carolina 29401
copelandj@charleston-sc.gov
(843)-724-3730

Attorneys for Respondents

(1)
**Notice of Appearance of Attorney Hines
as additional counsel for Respondents**

TO: THIS HONORABLE COURT AND OPPOSING COUNSEL

Please enter/note the appearance of attorney **Russell G. Hines** (SC Bar No. 72100), of the law firm Clement Rivers, LLP (“CR Law”), as additional counsel of record in this matter for Respondents, City of Charleston and Board of Zoning Appeals-Zoning. His contact information is provided in the signature block below.

(2)
**Motion to Withdraw Attorney McQueeney
as counsel for Respondents**

TO: THIS HONORABLE COURT

Besides CR Law attorney Hines, whose appearance as additional counsel for Respondents is noticed above, and CR Law attorney Wilbur E. Johnson (SC Bar No. 3062), who is already among Respondents’ counsel of record, Respondents are also represented in this matter by in-house counsel, i.e., full-time employee staff counsel from within the City of Charleston’s legal department (“City Legal Staff”).

The City Legal Staff attorneys who are currently counsel of record for Respondents in this Court are **Julia P. Copeland** (SC Bar No. 77199) and **Daniel S. McQueeney, Jr.** (SC Bar No. 6802). Mr. McQueeney, however, is no longer a City Legal Staff attorney.

Wherefore, Respondents’ other counsel of record in this matter—namely, attorneys **Copeland, Johnson, and Hines, who shall all remain counsel of record for Respondents**—joined by and with the consent of Mr. McQueeney (as evidenced via signature below), hereby

move this Honorable Court to allow **Mr. McQueeney** to **withdraw** as counsel of record for Respondents.

Respectfully submitted,

By: s/Russell G. Hines
CLEMENT RIVERS, LLP
Wilbur E. Johnson (SC Bar No. 3062)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
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and

Julia P. Copeland (SC Bar No. 77199)
CITY OF CHARLESTON
Legal Department
50 Broad Street
Charleston, South Carolina 29401
copelandj@charleston-sc.gov
(843)-724-3730

Attorneys for Respondents

Charleston, South Carolina

July 14, 2022

I JOIN AND CONSENT:

By: s/Daniel S. McQueeney, Jr.
Daniel S. McQueeney, Jr. (SC Bar No. 6802)
BURR & FORMAN LLP
100 Calhoun Street, Suite 400
Charleston, South Carolina 29401
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(843) 973-6886

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Respondents.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
Wilbur E. Johnson (SC Bar No. 3062)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
wjohnson@ycrlaw.com
rhines@ycrlaw.com
(843) 720-5488

and

Julia P. Copeland (SC Bar No. 77199)
CITY OF CHARLESTON
Legal Department
50 Broad Street
Charleston, South Carolina 29401
copelandj@charleston-sc.gov
(843)-724-3730

Attorneys for Respondents

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Respondents, hereby certify that the **(1) NOTICE OF APPEARANCE OF ATTORNEY HINES AS ADDITIONAL COUNSEL FOR RESPONDENTS AND (2) MOTION TO WITHDRAW ATTORNEY MCQUEENEY AS COUNSEL FOR RESPONDENTS** was served on July 14, 2022, on all parties to this matter via emailing (see attached) a copy of the same to the following:

Julia P. Copeland, Esquire
copelandj@charleston-sc.gov

City of Charleston
Legal Department
50 Broad Street
Charleston, SC 29401

Additional Counsel for Respondents

John A. Massalon, Esquire
jmassalon@wmalawfirm.net

Wills Massalon & Allen LLC
P.O. Box 859
Charleston, SC 29402

Attorneys for Appellant

Daniel S. McQueeney, Jr., Esquire
cmcqueeneychip@burr.com

Burr & Forman LLP
100 Calhoun Street, Suite 400
Charleston, SC 29401

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines (SC Bar No. 72100)
Attorneys for Respondents

Charleston, South Carolina

July 14, 2022

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Thursday, July 14, 2022 3:21 PM
To: 'copelandj@charleston-sc.gov'; 'jmassalon@wmalawfirm.net';
'cmcqueeneychip@burr.com'
Cc: Hines, Russell; Johnson, Wilbur; Justman, Aimee
Subject: Abdo v. City of Charleston and Board of Zoning Appeals; Appellate Case No. 2019-001910
Attachments: Abdo v. Charleston -- Not. of Appearance & Mot. to Withdraw.pdf

Enclosed please find the following which will be filed today with the Court of Appeals in the above-referenced matter:

- (1) Notice of Appearance of Attorney Hines as Additional Counsel for Respondents; and
- (2) Motion to Withdraw Attorney McQueeney as Counsel for Respondents.

Thank you,

Pollyana Bell
Project Assistant
Commercial Litigation Practice Group
Phone:(843)720-5488 | Fax:(843)579-1369



CLEMENT RIVERS, LLP
25 Calhoun Street • Suite 400 • Charleston, SC 29401
77 9799

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Thursday, July 14, 2022 3:26 PM
To: 'cmcqueeney@burr.com'
Subject: FW: Abdo v. City of Charleston and Board of Zoning Appeals; Appellate Case No. 2019-001910
Attachments: Abdo v. Charleston -- Not. of Appearance & Mot. to Withdraw.pdf

My apologies but it appears that I had an incorrect email for you. Please see below.

From: Bell, Pollyana (Polly)
Sent: Thursday, July 14, 2022 3:21 PM
To: 'copelandj@charleston-sc.gov' <copelandj@charleston-sc.gov>; 'jmassalon@wmalawfirm.net' <jmassalon@wmalawfirm.net>; 'cmcqueeneychip@burr.com' <cmcqueeneychip@burr.com>
Cc: Hines, Russell <RHines@ycrlaw.com>; Johnson, Wilbur <wjohnson@ycrlaw.com>; Justman, Aimee <AJustman@ycrlaw.com>
Subject: Abdo v. City of Charleston and Board of Zoning Appeals; Appellate Case No. 2019-001910

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Thank you,

Pollyana Bell
Project Assistant
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