

THE STATE OF SOUTH CAROLINA  
In The Court Of Appeals

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**Jul 11 2022**

**SC Court of Appeals**

APPEAL FROM SUMTER COUNTY

Court of Common Pleas

George M. McFaddin, Jr. Circuit Court Judge

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Case No. 2020-CP-43-01863, Circuit Court  
Appeals Court Docket No.: 2021-001368

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New Life Apostolic Church, Inc., and Ricky Finklea .....Appellants,

v.

Progressive Church of Our Lord Jesus Christ, Inc., Theodore Jenkins, Sr.,  
Lang Priestler, David S. Johnson, Sr., and Paul C. Johnson.....Respondents.

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**NOTICE OF MOTION AND MOTION TO WITHDRAW CO-COUNSEL FOR  
APPELLANTS NEW LIFE APOSTOLIC CHURCH, INC., AND RICKY FINKLEA**

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THIS MATTER COMES before this Court on motion of Boykin & Davis, LLC, to relieve Attorney Peter E. Keup as co-counsel for Appellants New Life Apostolic Church, Inc., and Ricky Finklea in the above captioned matter. Peter E. Keup is no longer employed with the Firm effective June 15, 2022. The Firm also moves to have Tierney F. Goodwyn, Esq. (S.C. Bar No. 102035) entered as co-counsel of record for Appellants New Life Apostolic Church, Inc., and Ricky Finklea. Ms. Goodwyn is admitted or otherwise authorized to practice in this Court.

**[SIGNATURE ON NEXT PAGE]**

Respectfully submitted

Boykin & Davis, LLC

By: 

Charles J. Boykin (SC Bar #65149)

Kenneth A. Davis (SC Bar #66416)

Tierney F. Goodwyn (SC Bar #102035)

P. O. Box 11844

Columbia, South Carolina 29211

Telephone: 803-254-0707

Facsimile: 803-254-5609

[cjboykin@boykinlawsc.com](mailto:cjboykin@boykinlawsc.com)

[kdavis@boykinlawsc.com](mailto:kdavis@boykinlawsc.com)

[tgoodwyn@boykinlawsc.com](mailto:tgoodwyn@boykinlawsc.com)

Attorneys for Appellants New Life  
Apostolic Church, Inc., and Ricky Finklea

July 11, 2022

Columbia, South Carolina

THE STATE OF SOUTH CAROLINA  
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**SC Court of Appeals**

APPEAL FROM CLARENDON COUNTY

Court of Common Pleas

George M. McFaddin, Circuit Court Judge

Case No. 2020-CP-43-01863, Circuit Court

Appeals Court Docket No.: 2021-001368

New Life Apostolic Church, Inc., and Ricky Finklea .....Appellants,  
v.

Progressive Church of Our Lord Jesus Christ, Inc., Theodore Jenkins, Sr.,  
Lang Priestler, David S. Johnson, Sr., and Paul C. Johnson.....Respondents.

**PROOF OF SERVICE**

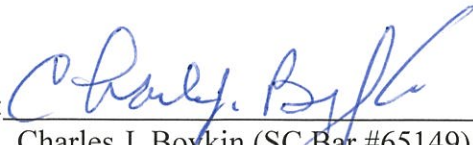
I certify that I have served **THE NOTICE OF MOTION AND MOTION TO WITHDRAW CO-COUNSEL FOR APPELLANTS NEW LIFE APOSTOLIC CHURCH, INC., AND RICKY FINKLEA** on the counsel of record listed below, by electronic mail and U.S. Mail a copy of same on July 11, 2022 addressed to:

James Y. Becker, Esq.,  
Haynsworth Sinkler Boyd, PA,  
1201 Main Street, 22nd Floor,  
Columbia, South Carolina 29201

Sarah P. Spruill, Esq.  
Haynsworth Sinkler Boyd, PA,  
Post Office Box 2048  
Greenville, South Carolina 29602

G. Murrell Smith, Jr., Esq.  
Smith Robinson Holler Dubose Morgan, LLC  
P.O. Box 580  
Sumter, South Carolina 29151

**[SIGNATURE NEXT PAGE]**

By:   
Charles J. Boykin (SC Bar #65149)  
Kenneth A. Davis (SC Bar #66416)  
Tierney F. Goodwyn (SC Bar #102035)

P. O. Box 11844  
Columbia, South Carolina 29211  
Telephone: 803-254-0707  
Facsimile: 803-254-5609

[cjboykin@boykinlawsc.com](mailto:cjboykin@boykinlawsc.com)  
[kdavis@boykinlawsc.com](mailto:kdavis@boykinlawsc.com)  
[tgoodwyn@boykinlawsc.com](mailto:tgoodwyn@boykinlawsc.com)

Attorneys for Appellants

# BOYKIN & DAVIS, LLC

Attorneys and Counselors at Law

220 STONERIDGE DRIVE, SUITE 100  
COLUMBIA, SOUTH CAROLINA 29210

TELEPHONE: 803-254-0707  
FACSIMILE: 803-254-5609

POST OFFICE BOX 11844  
COLUMBIA, SOUTH CAROLINA 29211

Charles J. Boykin  
cjboykin@boykinlawsc.com

July 11, 2022

VIA ELECTRONIC MAIL AND U.S. MAIL

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: New Life Apostolic Church, Inc., and Ricky Finklea v. Progressive Church of Our Lord Jesus Christ, Inc., Theodore Jenkins, Sr., Lang Priester, David S. Johnson, Sr., and Paul C. Johnson  
Appeals Court Docket No.: 2021-001368

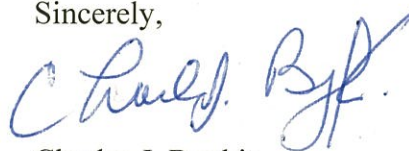
Dear Ms. Kitchings:

Enclosed for filing please find Appellant's Notice of Motion and Motion to Withdraw Co-Counsel submitted to the Court via electronic mail in the above-referenced case. Appellants New Life Apostolic Church, Inc., and Ricky Finklea has consented to the Motion. Also, enclosed please find the filing fee.

By copy of this letter, we are serving all parties of record.

Thank you for your assistance in this matter.

Sincerely,



Charles J. Boykin

/aeg

Enclosures

cc: Ricky Finklea, (w/encls.)  
James Y. Becker, Esq (w/encls.)  
Sarah P. Spruill, Esq (w/encls.)  
G. Murrell Smith, Jr., Esq. (w/encls.)  
Kenneth A. Davis, Esq. (w/o encls.)  
Tierney F. Goodwyn, Esq. (w/o encls.)

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