

9/6/22

THE STATE OF SOUTH CAROLINA  
In The Court Of Appeals

APPEAL FROM SUMTER COUNTY

Court of Common Pleas.

George M. McFaddin, Jr. Circuit Court Judge

**RECEIVED**

JUL 13 2022

SC Court of Appeals

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.

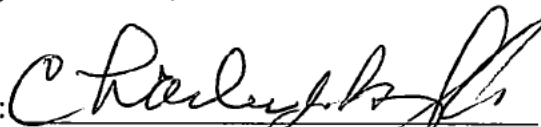
**NOTICE OF MOTION AND MOTION TO WITHDRAW CO-COUNSEL FOR  
APPELLANTS NEW LIFE APOSTOLIC CHURCH, INC., AND RICKY FINKLEA**

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)

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

July 11, 2022  
Columbia, South Carolina

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New Life Apostolic Church, Inc., and Ricky Finklea .....Appellants,  
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Progressive Church of Our Lord Jesus Christ, Inc., Theodore Jenkins, Sr.,  
Lang Priester, 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:

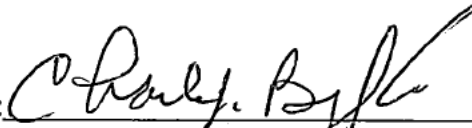
James Y. Becker, Esq.,  
Haynsworth Sinkler Boyd, PA,  
1201 Main Street, 22nd Floor,  
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Sarah P. Spruill, Esq.  
Haynsworth Sinkler Boyd, PA,  
Post Office Box 2048  
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G. Murrell Smith, Jr., Esq.  
Smith Robinson Holler Dubose Morgan, LLC  
P.O. Box 580  
Sumter, South Carolina 29151

[SIGNATURE NEXT PAGE]

By:



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Attorneys for Appellants

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Charles J. Boykin  
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July 11, 2022

## VIA ELECTRONIC MAIL AND U.S. MAIL

Elder Ricky Finklea  
508 N. Main Street  
Sumter, SC 29150

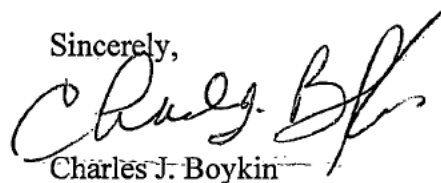
Re: New Life Apostolic Church, Inc., and Ricky Finklea v. Progressive Church of Our Lord Jesus Christ, Inc., Theodore Jenkins, Sr., Lang Priester, David S. Johnson, Sr., and Paul C. Johnson  
Appeals Court Docket No.: 2021-001368

Dear Elder Finklea:

This letter is to provide you with a brief update regarding the above-referenced matter. As Attorney Peter E. Keup is no longer employed with the Firm effective June 15, 2022, we have moved the Court of Appeals to relieve Mr. Keup as co-counsel. We have also moved to have Tierney F. Goodwyn entered as co-counsel in this matter. Enclosed please find a copy of the Motion to Withdraw Counsel in the above-referenced matter.

Should you have any questions, please feel free to contact our office.

Sincerely,



Charles J. Boykin

/aeg

Enclosure.

cc: SC Court of Appeals, Clerk of Court (w/encl.)  
Kenneth A. Davis, Esq. (w/o encl.)  
Tierney F. Goodwyn, Esq. (w/o encl.)

# BOYKIN & DAVIS, LLC

Attorneys and Counselors at Law

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**SC Court of Appeals**

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

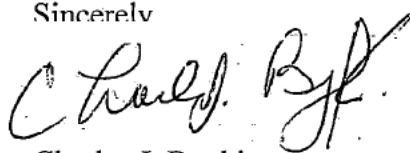
Dear Ms. Kitchings:

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.)

**BOYKIN & DAVIS, LLC**  
Attorneys and Counselors at Law

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**SC Court of Appeals**

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