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May 14, 2013

V. Claire Allen
Deputy Clerk
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Hansen, Eric v. Employers Insurance (1)
Appellate Case No.: 2008-095691

Dear Ms. Allen:

Pursuant to your instructions, I am writing to request that our firm be removed as counsel of record for this appeal. As explained below, our former client, Robert Moran, is no longer a party to this action. Therefore, we should no longer be listed as counsel of record, and we do not need to receive any future correspondence in this matter from the Court or the remaining parties.

When this case began many years ago, John Wilkerson of our firm was retained to represent Robert Moran, one of the defendants. On September 23, 2004, the circuit court granted summary judgment in Mr. Moran's favor as to all of the plaintiff's claims. The plaintiff (Eric Hansen) appealed that order, but this Court affirmed the circuit judge's ruling on June 26, 2006. The plaintiff filed a petition for a writ of certiorari, which the Supreme Court denied in August of 2006. When the Supreme Court denied that petition, the judgment in Mr. Moran's favor became final, and he was no longer a party to this action.

This Court's opinion filed on June 26, 2006, left in place some of the plaintiff's claims against defendants other than Mr. Moran. Thus, the case was remanded to the circuit court. The action proceeded under the original caption, which listed Mr. Moran as a defendant, even though Mr. Moran was no longer a party. As a result, the circuit court and some of the parties continued

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to include our firm on correspondence about the case. Efforts to have our firm removed from the counsel of record lists were unsuccessful.

Eventually, the circuit court issued an order that disposed of the plaintiff's claims against the remaining defendants. This led to the current appeal. Our former client, Mr. Moran, is not involved in this appeal in any way. Mr. Moran has been out of this action for almost seven years now, and the challenged orders do not affect him at all. He has not submitted any briefs or arguments in this appeal, nor would he have standing to do so. Therefore, we respectfully request that the caption of this appeal be changed to list Mr. Moran as one of the original defendants, but not as a respondent. We further request that the Court and all other parties remove our firm from their respective lists of the attorneys of record for this appeal.

Thank you for your kind assistance, and please do not hesitate to contact me if you need any further information.

Sincerely,

TURNER, PADGET, GRAHAM & LANEY, P.A.



R. Hawthorne Barrett

RHB:

cc: Eric Hansen
Robert W. Achurch, III, Esq.
Mary Bass Lohr, Esq.
Pope D. Johnson, III, Esq.