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SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Ralph King Anderson, III, Chief Administrative Law Judge

Appellate Case No. 2017-002598

ALC Case Nos. 17-ALJ-07-0041-CC; 17-ALF-07-0040-CC; 17-ALF-07-0039-CC

Charles S. Blackmon and South Carolinians for  
Responsible Agricultural Practices ..... Appellants,

v.

South Carolina Department of Health and Environmental  
Control and David Coggins Broilers..... Respondents;

Charles S. Blackmon and South Carolinians for  
Responsible Agricultural Practices ..... Appellants,

v.

South Carolina Department of Health and Environmental  
Control and Heath Coggins Broilers..... Respondents;

Charles S. Blackmon and South Carolinians for  
Responsible Agricultural Practices ..... Appellants,

v.

South Carolina Department of Health and Environmental  
Control and Jim Young Broilers. .... Respondents.

**MOTION OF TRACEY C. GREEN TO WITHDRAW AS COUNSEL OF RECORD FOR  
RESPONDENTS DAVID COGGINS BROILERS, HEATH COGGINS BROILERS, AND  
JIM YOUNG BROILERS**

Pursuant to Rules 240 and 264(b) of the South Carolina Appellate Court Rules, Tracey C. Green moves to withdraw as counsel of record for Respondents David Coggins Broilers, Heath Coggins Broilers, and Jim Young Broilers. Respondents have consented to the withdrawal as indicated in the attached document. Mitchell Willoughby of Willoughby & Hoefer, P.A. will continue to serve as counsel of record for Respondents.

Respectfully submitted,

s/Tracey C. Green

Tracey C. Green (S.C. Bar No. 9342)

**BURR & FORMAN LLP**

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tgreen@burr.com

Columbia, South Carolina  
September 6, 2022

Tracey C. Green  
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August 24, 2022

**VIA EMAIL AND U.S. MAIL**

Mr. David Coggins  
Mr. Heath Coggins  
Mr. Jim Young  
1094 Lisbon Road  
Mountville, SC 29370  
heathcoggins@yahoo.com

Re: *Charles S. Blackmon v. SCDHEC*; Appellate Case No. 2017-002598

Dear Sirs:

As you know, I am no longer employed with Willoughby & Hoefler, P.A. and I am aware that Willoughby & Hoefler is continuing to handle your case. I therefore respectfully ask for your consent both individually and on behalf of David Coggins Broilers, Heath Coggins Broilers, and Jim Young Broilers to withdraw as counsel of record in this matter. Please sign this letter below consenting to my withdrawal and then either return this letter to me by email or U.S. Mail in the enclosed envelope so that I may file the appropriate motion with the South Carolina Court of Appeals.

Thank you for allowing me to help you in this matter. If you have any questions, or if I can be of service in the future, please call.

Very truly yours,

**Burr & Forman LLP**

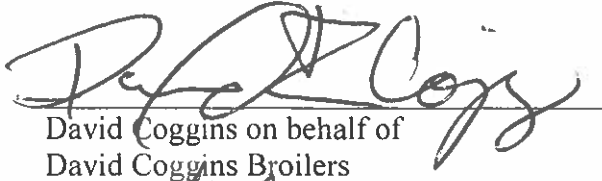
Tracey C. Green

TCG/Ita

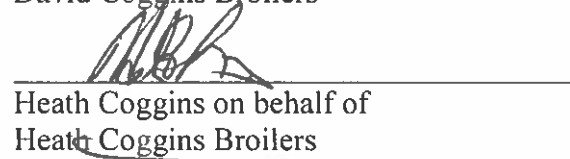
Mr. David Coggins  
Mr. Heath Coggins  
Mr. Jim Young  
August 24, 2022  
Page 2 of 2

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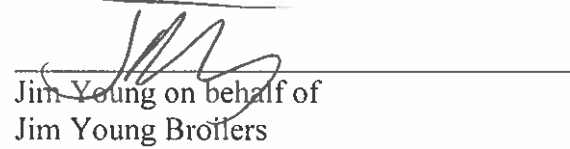
As indicated below, we consent to the withdrawal of Tracey C. Green as counsel of record in the above-referenced matter.

  
\_\_\_\_\_  
David Coggins on behalf of  
David Coggins Broilers

8-27-2022  
Date

  
\_\_\_\_\_  
Heath Coggins on behalf of  
Heath Coggins Broilers

8/27/2022  
Date

  
\_\_\_\_\_  
Jim Young on behalf of  
Jim Young Broilers

8/25/22  
Date

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**SC Court of Appeals**

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Control and Jim Young Broilers. .... Respondents.

**PROOF OF SERVICE**


This is to certify that I, Laura Lee Andrews, a paralegal with the law firm of Burr & Forman LLP, have caused to be served this day one (1) copy of the **Motion of Tracey C. Green to Withdraw as Counsel of Record for Respondents David Coggins Broilers, Heath Coggins Broilers, and Jim Young Broilers** in the above-captioned matter on counsel of record via email and as set forth below:

Robert Guild, Esquire  
**Robert Guild, Attorney at Law**  
314 Pall Mall Street  
Columbia, SC 29201  
bguild@mindspring.com

Stephen P. Hightower, Esquire  
Sara V. Martinez, Esquire  
**South Carolina Department of Health and Environmental Control**  
2600 Bull Street  
Columbia, SC 29201  
hightosp@dhec.sc.gov  
martinsv@dhec.sc.gov

Mitchell Willoughby, Esquire  
**Willoughby & Hoefler, P.A.**  
930 Richland Street  
Columbia, SC 29201  
mwilloughby@willoughbyhoefler.com

A copy of the email serving counsel as stated above is attached hereto.

  
\_\_\_\_\_  
Laura Lee Andrews  
Paralegal

Columbia, South Carolina  
September 6, 2022

## Andrews, Laura Lee

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**From:** Andrews, Laura Lee  
**Sent:** Tuesday, September 6, 2022 3:27 PM  
**To:** bguild@mindspring.com; mwilloughby@willoughbyhoefer.com; hightosp@dhec.sc.gov; martinsv@dhec.sc.gov  
**Cc:** Green, Tracey  
**Subject:** Charles S. Blackmon v. SCDHEC | Appellate Case No. 2017-002598  
**Attachments:** Doc#\_48961102\_v\_1\_2022-09-06 Filing ltr re Mot to Withdraw (2017-002598).PDF; Doc#\_48961100\_v\_1\_2022-09-06 Mot to Withdraw (2017-002598).PDF

Good afternoon,

As permitted by Rule 262, SCACR and Supreme Court Order 2022-05-06-03, part (d)(1), attached for service is a copy of the Motion of Tracey C. Green to Withdraw as Counsel of Record for Respondents David Coggins Broilers, Heath Coggins Broilers, and Jim Young Broilers in the above-captioned matter. These documents will be filed shortly with the Court of Appeals and this email will be attached to the proof of service of same.

**Laura Lee Andrews**

*Paralegal*

**BURR**   
**FORMAN** LLP

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The information contained in this email is intended for the individual or entity above. If you are not the intended recipient, please do not read, copy, use, forward or disclose this communication to others; also, please notify the sender by replying to this message, and then delete this message from your system. Thank you.

Tracey C. Green  
tgreen@burr.com  
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Suite 1800  
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September 6, 2022

**VIA ELECTRONIC FILING**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201  
ctappfilings@sccourts.org

**RECEIVED**  
**Sep 06 2022**  
**SC Court of Appeals**

Re: *Charles S. Blackmon v. SCDHEC*; Appellate Case No. 2017-002598

Dear Ms. Kitchings:

Attached for filing pursuant to Rules 240, 262, and 264(b) of the South Carolina Appellate Court Rules, please find the Motion of Tracey C. Green to Withdraw as Counsel of Record for Respondents David Coggins Broilers, Heath Coggins Broilers, and Jim Young Broilers in the above-referenced matter.

A check in the amount of \$50.00 is being forwarded to your attention via U.S. Mail for the required filing fee.

By copy of this letter, I am serving all parties via email as permitted by Supreme Court Order 2022-05-06-03, part (d)(1), and attached is a proof of service to that effect.

If you have any questions or need additional information, please do not hesitate to contact me.

Very truly yours,

**Burr & Forman-LLP**



Tracey C. Green

TCG/lla  
Attachments

The Honorable Jenny Abbott Kitchings

September 6, 2022

Page 2 of 2

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cc: Robert Guild, Esquire (via email)  
Stephen Philip Hightower, Esquire (via email)  
Sara V. Martinez, Esquire (via email)  
Mitchell Willoughby, Esquire (via email)