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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHESTER COUNTY
Court of Common Pleas

John C. Hayes, III, Circuit Court Judge
Brian M. Gibbons, Circuit Court Judge

Appellate Case No. 2022-001312

Heidi Gersten, Ivanka Ayoub, Daniel Hubbard, Plaintiffs, Of whom Heidi Gersten is the Appellant,

v.

Kevin Carter, Richard Davis, Joseph Tirbovich, Nationwide Insurance Company, Interinsurance Exchange of the Automobile Club, John Ammendola, Trustguard Insurance Company, SC Department of Public Safety, Chevrolet, GMC, and Unknown John Does. Respondents.

RESPONDENTS TRUSTGUARD INSURANCE COMPANY AND JOHN AMMENDOLA’S MOTION TO WITHDRAW, SUBSTITUTION OF COUNSEL AND NOTICES OF APPEARANCE

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, counsel for Respondents Trustgard Insurance Company and John Ammendola (“Respondents”) respectfully move for an Order granting the substitution of Kelsey J. Brudvig, Esquire and Christian Stegmaier, Esquire as counsel for Respondents in

place of Peter H. Dworjanyn, Esquire and Michael R. Burchstead, Esquire. Mr. Dworjanyn and Mr. Burchstead have left the firm of Collins & Lacy, PC and withdraw as counsel. Kelsey J. Brudvig, Esquire and Christian Stegmaier, Esquire, enter their appearance at this time and request that all copies of correspondence, petitions, briefs, and/or Record on Appeal exchanged between the parties of record and the court be served upon the undersigned at the address set forth herein below. This substitution of counsel will neither prejudice the parties nor cause undue delay in the disposition of this matter.

[SIGNATURE PAGE FOLLOWS]

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TRUSTGARD INSURANCE COMPANY
AND JOHN AMMENDOLA

**RESPONDENTS TRUSTGUARD
INSURANCE COMPANY AND JOHN
AMMENDOLA'S MOTION TO
WITHDRAW, SUBSTITUTION OF
COUNSEL AND NOTICES OF
APPEARANCE**

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PROOF OF SERVICE

I hereby certify that I caused to have served **RESPONDENTS TRUSTGUARD INSURANCE COMPANY AND JOHN AMMENDOLA'S MOTION TO WITHDRAW, SUBSTITUTION OF COUNSEL AND NOTICES OF APPEARANCE** upon all parties, by electronic mail and/or placing a copy in the United States mail, postage prepaid, to all parties and/or counsel of record on October 5, 2022, addressed to the following:

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ATTORNEYS FOR RESPONDENT

**PROOF OF SERVICE -
RESPONDENTS TRUSTGUARD
INSURANCE COMPANY AND JOHN
AMMENDOLA'S MOTION TO
WITHDRAW, SUBSTITUTION OF
COUNSEL AND NOTICES OF
APPEARANCE**

October 5, 2022
Columbia, South Carolina

October 5, 2022

VIA EMAIL & UNITED STATES MAIL

The Honorable Jenny A. Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

Re: Heidi Gersten, Ivanka Ayoub, Daniel Hubbard, Plaintiffs, Of whom Heidi Gersten and Ivanka Ayoub are Appellants, v. Kevin Carter, Richard Davis, Joseph Tirbovich, Nationwide Insurance Company, Interinsurance Exchange of the Automobile Club, John Ammendola, Trustgard Ins. Co., Blackwell, SC Department of Public Safety, Chevrolet, GMC, Unknown John Does, Respondents.

Civil Action No. 2018-002115

Claim No. APV001860444

C&L File No. 001788-00130

Dear Ms. Kitchings:

Please find enclosed the original and seven copies of Respondents Trustgard Insurance Company and John Ammendola's Motion to Withdraw, Substitution of Counsel and Notices of Appearance in connection with the above referenced matter. Also enclosed please find our firm's check in the amount of \$50.00, representing the filing fee of same. Please return a stamped clocked-in copy to us using the enclosed envelope.

Thank you for your time and attention. Should you have any questions or concerns, please do not hesitate to contact us.

Respectfully,



Christian Stegmaier

CS/mmm

Enclosures

cc (via email):

Heidi Gersten
William H. Davidson, II, Esquire
Alexander S. Hogsette, Esquire
David R. Sligh, Esquire
Wesley Brian Sawyer, Esquire
Reynolds Williams, Esquire