

STATE OF SOUTH CAROLINA	)	<b>IN THE APPELLATE COURT</b>
	)	Civil Action No.: 2021-CP-26-01967
Jason C. Bealand, Jonathan A. Bealand, & Revive Air, LLC,	)	Appellate Case No. 2022-001265
	)	
Plaintiffs,	)	
v.	)	<b>Notice of Motion and Motion to be</b>
	)	<b>Relieved as Defendant’s Counsel</b>
Nicholas P. DeLuca,	)	
	)	
Defendant.	)	
	)	
	)	

**PLEASE TAKE NOTICE** that Thomas W. Winslow, Esq. and the law firm of Winslow Law, LLC, counsel for Defendant in the above-captioned matter, requests to be relieved as counsel for the Defendant.

This Motion is based on the following grounds:

1. Attorney Thomas W. Winslow, Esq. was hired on limited bases to represent the Defendant in the lower court Motion to be Relieved of Default Judgment of this matter, Civil Action No.: 2022-CP-26-01967;
2. Defendant is in agreement with Attorney Thomas W. Winslow, Esq. and Winslow Law, LLC being relieved as counsel in this matter;
3. Therefore, Counsel requests this Court to relieve him as counsel for Defendant as Defendant did not hire us as Counsel to represent them in this Appeal and pursue the matter further;
4. This Motion is not made for the purpose of delay or obfuscation.

**WHEREFORE**, Thomas W. Winslow, Esq. moves this honorable Court for an Order relieving himself and Winslow Law, LLC as counsel of record for the Plaintiffs.

Respectfully submitted,  
**WINSLOW LAW, LLC**

s/ Thomas W. Winslow, Esq.  
Thomas W. Winslow, Esquire (SCSB#73584)  
11019 Ocean Highway  
Pawleys Island, SC 2985  
Telephone: (843) 357-9301  
Fax: (843) 357-9303  
tom@winslowlawyers.com  
*Attorney for Defendant*

Pawleys Island, South Carolina  
October 4, 2022

Oct 06 2022

SC Court of Appeals

STATE OF SOUTH CAROLINA )  
 )  
 Jason C. Bealand, Jonathan A. Bealand, & )  
 Revive Air, LLC, )  
 )  
 Plaintiffs, )  
 )  
 v. )  
 )  
 Nicholas P. DeLuca, )  
 )  
 Defendant. )  
 )  
 )

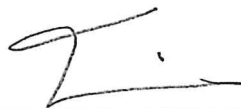
**IN THE APPELLATE COURT**  
 Civil Action No.: 2021-CP-26-01967  
 Appellate Case No. 2022-001265

**Certificate of Service**

I, Thomas W. Winslow, Esq., an attorney with Winslow Law, LLC, attorney for **Defendant Nicholas P. DeLuca**, hereby certify that I have served a copy of the foregoing Notice of Motion and Motion to be Relieved as Defendant’s Counsel to the parties as indicated below by **mailing** a copy of the same by Via Email and Regular US Mail on **October 4, 2022**, to the following parties:

Nicholas P. DeLuca  
 493 Emerson Drive  
 Myrtle Beach, SC 29579

Pawleys Island, South Carolina  
 October 4, 2022

By:   
 \_\_\_\_\_  
 Thomas W. Winslow, Esq.

STATE OF SOUTH CAROLINA )  
 )  
 Jason C. Bealand, Jonathan A. Bealand, & )  
 Revive Air, LLC, )  
 )  
 Plaintiffs, )  
 )  
 v. )  
 )  
 Nicholas P. DeLuca, )  
 )  
 Defendant. )  
 )  
 )

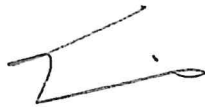
**IN THE APPELLATE COURT**  
 Civil Action No.: 2021-CP-26-01967  
 Appellate Case No. 2022-001265

**Certificate of Service**

I, Thomas W. Winslow, Esq., an attorney with Winslow Law, LLC, attorney for **Defendant Nicholas P. DeLuca**, hereby certify that I have served a copy of the foregoing Notice of Motion and Motion to be Relieved as Defendant’s Counsel to the parties as indicated below my **mailing** a copy of the same by Certified and Regular US Mail on **October 4, 2022**, to the following parties:

Law Offices of John M. Leiter, PA  
 Attn: John M. Leiter, Esq.  
 405 79<sup>th</sup> Avenue North, Suite B  
 Myrtle Beach, SC 29572

Pawleys Island, South Carolina  
 October 4, 2022

By:   
 \_\_\_\_\_  
 Thomas W. Winslow, Esq.

RECEIVED

Oct 06 2022

SC Court of Appeals

STATE OF SOUTH CAROLINA )  
 )  
 Jason C. Bealand, Jonathan A. Bealand, & )  
 Revive Air, LLC, )  
 )  
 Plaintiffs, )  
 )  
 v. )  
 )  
 Nicholas P. DeLuca, )  
 )  
 Defendant. )  
 )  
 )

**IN THE APPELLATE COURT**  
 Civil Action No.: 2021-CP-26-01967  
 Appellate Case No. 2022-001265

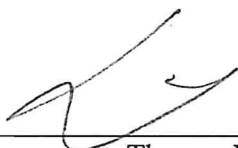
**Certificate of Service**

I, Thomas W. Winslow, Esq., an attorney with Winslow Law, LLC, attorney for **Defendant Nicholas P. DeLuca**, hereby certify that I have served a copy of the foregoing Notice of Motion and Motion to be Relieved as Defendant’s Counsel to the parties as indicated below my **mailing** a copy of the same by Certified and Regular US Mail on **October 4, 2022**, to the following parties:

Stevens Law Firm, P.C.  
 Attn: James P. Stevens, Jr., Esq.  
 1529 Mulberry Street, Suite A  
 Little River, SC 29566

Stevens Law Firm, P.C.  
 Attn: Natalie S. Stevens-Graziani, Esq.  
 1529 Mulberry Street, Suite A  
 Little River, SC 29566

Pawleys Island, South Carolina  
 October 4, 2022

By:   
 \_\_\_\_\_  
 Thomas W. Winslow, Esq.

Thomas W. Winslow\*  
Allie A. Brown  
M. Nicole Gattis  
Casey M. Brown  
J. Webster Hall  
Jamie M. Morehead



\*Certified Civil Mediator  
\* Licensed in SC and DC  
\* LLM Maritime Law

Phone: 843-357-9301  
Fax: 843-357-9303

[www.winslowlawyers.com](http://www.winslowlawyers.com)  
[www.facebook.com/winslowlawllc](https://www.facebook.com/winslowlawllc)

October 4, 2022

**VIA CERTIFIED MAIL, RESTRICTED DELIVERY**

**Nicholas DeLuca**  
**493 Emerson Drive**  
**Myrtle Beach, SC 29579**

**Re: Nicholas DeLuca**  
**Motion to be Relieved as Counsel**  
**Civil Action No.: 2022CP2601967**  
**Appellate Case No. 2022-001265**  
**Winslow File No.: 2022.06013**

Dear Mr. DeLuca:

Please find enclosed a copy of the foregoing Notice of Motion and Motion to be Relieved as Defendant's Counsel regarding the above referenced matter. If you have any other questions or concerns, please do not hesitate to reach out to us.

Sincerely Yours,  
**Winslow Law, LLC**

Thomas W. Winslow, Esq.  
Briyanna Alisha Livingston  
Paralegal for Thomas W. Winslow, Esq.

TWW/bal  
Enclosures:

Thomas W. Winslow\*  
Allie A. Brown  
M. Nicole Gattis  
Casey M. Brown  
J. Webster Hall  
Jamie M. Morehead



\* Certified Civil Mediator  
\* Licensed in SC and DC  
\* LLM Maritime Law

Phone: 843-357-9301  
Fax: 843-357-9303

[www.winslowlawyers.com](http://www.winslowlawyers.com)  
[www.facebook.com/winslowlawllc](http://www.facebook.com/winslowlawllc)

October 6, 2022

VIA EMAIL: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

**Re: Nicholas DeLuca**  
**Civil Action No.: 2022CP2601967**  
**Appellate Case No. 2022-001265**  
**Winslow File No.: 2022.06013**

**RECEIVED**

**Oct 06 2022**

**SC Court of Appeals**

To Whom It May Concern:

Please find enclosed a copy of Notice of Motion & Motion to be Relieved as Defendant's Counsel and Certificate of Service regarding the above referenced matter. If you have any questions or concerns, please let us know.

Thank you for your cooperation in this matter.

Sincerely Yours,  
**Winslow Law, LLC**

Thomas W. Winslow, Esq.  
Briyanna Alisha Livingston  
Paralegal for Thomas W. Winslow, Esq.

TWW/bal  
Enclosures:

**MAIN OFFICE AND MAILING ADDRESS**  
11019 Ocean Highway  
Pawleys Island, SC 29585

**SURFSIDE BEACH ADDRESS**  
1991 Glens Bay Road, Suite 103(C)  
Surfside Beach, SC 29585

**COLUMBIA ADDRESS**  
2231 Devine Street, Suite 103  
Columbia, SC 29205