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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Jennifer B. McCoy, Circuit Court Judge

Case No. 2017-CP-10-00838
Appellate Case No. 2020-001210

Jacque Lucas, Shirley Ann Lucas,
and Daniel Simerly,

Appellants,

v.

KapStone Paper and Packaging Corporation,
KapStone Kraft Paper Corporation, Safway Group
Holdings, LLC, Easy Way Insulation Co., Sypris
Technologies, Inc. f/k/a Tube-Turns Technologies Inc.,
Thompson Construction Group, Inc., and Thompson
Industrial Services, LLC,

Defendants,

Of which

KapStone Paper and Packaging Corporation and
KapStone Kraft Paper Corporation are

Respondents.

APPELLANTS' MOTION TO SUBSTITUTE COUNSEL

GRIFFIN HUMPHRIES LLC
Badge Humphries (S.C. Bar No. 72904)
2113 Middle Street, Suite 305
Sullivan's Island, South Carolina 29482
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CALLISON TIGHE & ROBINSON, LLC
D. Reece Williams, III (S.C. Bar No. 6120)
Richard C. Detwiler (S.C. Bar No. 6473)
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Counsel for Appellants

This Motion of the Appellants, Jacque Lucas, Shirley Ann Lucas, and Daniel Simerly, seeks an Order from this Court substituting Badge Humphries of Griffin Humphries LLC and relieving the firm of Callison, Tighe & Robinson, LLC as counsel for Appellants. In support of this Motion, Appellants state as follows:

1. Appellants wish to substitute counsel.
2. Relieving the firm of Callison, Tighe & Robinson, LLC as counsel of record in this matter will not unreasonably delay the case or prejudice the parties in any manner.
3. Counsel for Appellants has consulted with counsel for Respondents, and Respondents have no objection to this request.

WHEREFORE, Appellants respectfully requests that the Court enter an order substituting Griffin Humphries LLC and relieving the law firm of Callison, Tighe & Robinson, LLC as counsel for the Appellants in this matter.

Respectfully submitted,

GRIFFIN HUMPHRIES LLC

Sullivan's Island, South Carolina
October 12, 2022

s/ Badge Humphries

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WE CONSENT:

CALLISON TIGHE & ROBINSON, LLC

s/ Ian T. Duggan

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Defendants,

Of which

KapStone Paper and Packaging Corporation and
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Respondents.

PROOF OF SERVICE

I hereby certify that, on this date, the **APPELLANTS' MOTION TO SUBSTITUTE COUNSEL** was served on Respondents' counsel via email pursuant to Rule 262(c)(3), SCAR:

**ATTORNEY FOR KAPSTONE PAPER AND PACKING
CORPORATION AND KAPSTONE KRAFT PAPER
CORPORATION**

Richard H. Willis, Esquire
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A copy of the service email is attached hereto, as required

I further certify that all parties required by Rule to be served have been served.

Sullivan's Island, South Carolina
October 12, 2022

s/ Badge Humphries
Badge Humphries (S.C. Bar No. 72904)
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Daphne L. Greve

From: Daphne L. Greve
Sent: Wednesday, October 12, 2022 4:30 PM
To: rwillis@williamsmullen.com; dtarver@williamsmullen.com
Cc: Badge Humphries; reecewilliams@callisontighe.com; rickdetwiler@callisontighe.com; ianduggan@callisontighe.com; rpost@beckredde.com; dhammond@beckredde.com
Subject: Lucas et al. v. KapStone Paper and Packaging Corporation et al., Appellate Case No. 2020-001210
Attachments: 2022-10-12_Mot to Substitute_Ct Appeals.pdf

Counsel:

Pursuant to Badge Humphries' instructions, please see attached Appellants' Motion to Substitute Counsel in the above-referenced matter, which is being filed today with the Court of Appeals.

Respectfully,

Daphne Greve

DAPHNE L. GREVE
PARALEGAL



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