

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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Nov 09 2022

SC Court of Appeals

Appeal from Charleston County
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

Appellate Case No. 2022-000038
Circuit Court Case No. 2021-CP-10-00562

Clam Farm Partnership, LLC,

Respondent,

v.

The South Carolina Department of Health and Environmental
Control, Office of Ocean and Coastal Resource Management,
Charleston County, and The City of Folly Beach,

Defendants,

Of which The South Carolina Department of Health and
Environmental Control, Office of Ocean and Coastal Resource
Management and The City of Folly Beach are,

Appellants.

MOTION TO WITHDRAW AS COUNSEL OF RECORD

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400 (29401)
P.O. Box 993
Charleston, South Carolina 29402
(843) 720-5488
Attorneys for The City of Folly Beach

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

Appellant The City of Folly Beach (“Folly Beach”) is represented in this matter by Clement Rivers, LLP. Among the Clement Rivers attorneys who have appeared in the matter on behalf of Folly Beach is Chandler D. Rowh. Mr. Rowh has left Clement Rivers to practice with another law firm. Accordingly, the other Clement Rivers attorneys who have appeared on behalf of Folly Beach in this matter —namely, Stephen L. Brown and Russell G. Hines, all of whom shall remain counsel of record for Folly Beach—joined by and with the consent of Mr. Rowh (as evidenced by his signature below, his signature block reflecting his new firm), hereby move this Honorable Court to allow Mr. Rowh to withdraw as counsel of record for Folly Beach.

Respectfully submitted,

CLEMENT RIVERS, LLP

By: *s/Stephen L. Brown*
Stephen L. Brown (SC Bar No. 66468)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400 (29401)
P.O. Box 993
Charleston, South Carolina 29402
(843) 720-5488
Attorneys for The City of Folly Beach

Charleston, South Carolina

November 9, 2022

*[Consent Signature page for Motion To Withdraw As Counsel Of Record,
Appellate Case No. 2022-000038]*

I JOIN AND CONSENT:

By: s/Chandler D. Rowh
Chandler D. Rowh (SC Bar No. 103687)
Maron Marvel Bradley Anderson &
Tardy LLC
259 Seven Farms Drive, Suite 300
Charleston, SC 29492
(843) 727-0001
crowh@maronmarvel.com

Charleston, South Carolina

Dated: November 9, 2022

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Appellants.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400 (29401)
P.O. Box 993
Charleston, South Carolina 29402
(843) 720-5488
Attorneys for The City of Folly Beach

I, Stephen L. Brown, of Clement Rivers, LLP, attorneys for Appellant The City of Folly Beach, hereby certify that the **MOTION TO WITHDRAW AS COUNSEL OF RECORD** was served on Respondent, Clam Farm Partnership, LLC, and all other parties to this appeal on November 10, 2022, by emailing (see attached) a copy of the same to all counsel of record:

Matthew Tillman, Esquire Matthew.Tillman@wbd-us.com
Daniel Q. Orvin, Esquire dan.orvin@wbd-us.com
Womble Bond Dickinson (US) LLP
5 Exchange Street
Charleston, SC 29401
Attorneys for Respondent Clam Farm Partnership, LLC

Randell C. Stoney, Jr., Esquire rstoney@barnwell-whaley.com
M. Dawes Cooke, Jr., Esquire mdc@barnwell-whaley.com
Allison M. Burns, Esquire aburns@barnwell-whaley.com
Barnwell Whaley Patterson & Helms
P.O. Drawer H
Charleston, SC 29402-0197
Attorneys for Defendants The South Carolina Department of Health and Environmental Control, Office of Ocean and Coastal Resource Management

Andrew S. Halio, Esquire ashelio@bellsouth.net
Halio & Halio
P.O. Box 747
Charleston, SC 29402-0747
Attorneys for Defendants Charleston County

CLEMENT RIVERS, LLP

By: s/Stephen L. Brown
Stephen L. Brown
Attorneys for The City of Folly Beach

Charleston, South Carolina

November 9, 2022

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Wednesday, November 9, 2022 3:57 PM
To: 'dan.orvin@wbd-us.com'; 'Matthew.Tillman@wbd-us.com'; 'rstoney@barnwell-whaley.com'; 'mdc@barnwell-whaley.com'; 'mmason@barnwell-whaley.com'; 'aburns@barnwell-whaley.com'; 'ksmurro@barnwell-whaley.com'; 'jfletcher@barnwell-whaley.com'; 'jchilders@barnwell-whaley.com'; 'ashalio@bellsouth.net'; 'sgiblin@bellsouth.net'
Cc: 'Chandler Rowh'; Brown, Stephen L.; Justman, Aimee; Vaird, Antionette
Subject: Clam Farm Partnership, LLC v. SC DHEC et al. //2022-000038
Attachments: Mtn to Withdraw as Counsel of Record.pdf

Enclosed please find Appellant The City of Folly Beach's Motion to Withdraw as Counsel of Record which will be filed today in the above-referenced matter.

Thank you,

Pollyana Bell
Project Assistant
Commercial Litigation Practice Group
Phone:(843)720-5488 | Fax:(843)579-1369



CLEMENT RIVERS, LLP
25 Calhoun Street • Suite 400 • Charleston, SC 29401
FOR COUNSEL