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Nov 16 2022
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHESTER COUNTY
Court of Common Pleas

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

Appellate Case Nos.: 2022-001312 and 2022-001390

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,
Unknown Joe Does, RESPONDENTS.

**NOTICE OF APPEARANCE AND MOTION FOR SUBSTITUTION OF
RESPONDENT NATIONWIDE INSURANCE COMPANY'S COUNSEL**

PLEASE TAKE NOTICE that Pamela J. Larson of WOMBLE BOND DICKINSON (US) LLP, hereby enter their appearance as counsel for Respondent Nationwide Insurance Company (“Nationwide”) in the above-captioned case.

In addition, Nationwide respectfully moves pursuant to SCACR 264(b) for an order permitting David Sligh to withdraw as counsel for Nationwide in the above-captioned case. Nationwide has transferred the handling of this matter to WOMBLE BOND DICKINSON (US) LLP and thus has received reasonable notice and consents to Mr. Sligh’s withdrawal from this case.

Respectfully submitted this the 16th day of November, 2022.

WE SO CONSENT:

s/Pamela J. Larson
Pamela J. Larson (SC Bar No. 104181)
WOMBLE BOND DICKINSON (US) LLP
5 Exchange Street (29401)
P.O. Box 999
Charleston, SC 29402
(843) 720-4630
Pamela.larson@wbd-us.com

*Attorney for Respondent Nationwide
Insurance Company*

s/David R. Sligh
David R. Sligh (SC Bar No. 77493)
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Conway, SC 29576
(843) 248-4229
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an attorney at law licensed to practice in the State of South Carolina, is attorney for Defendant and is a person of such age and discretion as to be competent to serve process.

That on November 16, 2022, she served a copy of the attached **NOTICE OF APPEARANCE AND MOTION FOR SUBSTITUTION OF RESPONDENT NATIONWIDE INSURANCE COMPANY'S COUNSEL** by placing said copy in a first-class postpaid envelope and addressed to the person hereinafter named, at the place and address stated below, and by depositing said envelope and its contents in the United States Mail at Charleston, South Carolina.

Heidi Gersten
1438 West Lantana Rd. #330
Lantana, FL 33462

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s/Pamela J. Larson

Pamela J. Larson

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Pamela Larson

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November 16, 2022

VIA EMAIL & UNITED STATES MAIL

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

Re: Heigi 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.

Dear Ms. Kitchings,

Please find enclosed the original and seven copies of Respondent Nationwide Insurance Company's Notice of Appearance and Motion for Substitution of Respondent Nationwide Insurance Company's Counsel in connection with the above reference matter. Also enclosed, please find our firm's payment in the amount of \$50.00, representing the filing fee of the same.

Thank you for your time and attention.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Pamela Larson', written in a cursive style.

Pamela Larson

Enclosures

Cc (via email):

Heidi Gersten
David Sligh, Esquire
Kelsey Brudvig, Esquire
Christian Stegmaier, Esquire
Wesley Brian Sawyer, Esquire
William Davidson, Esquire
Reynolds Williams, Esquire