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Feb 07 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY
CIRCUIT COURT
THE HONORABLE LETITIAVERDIN

Appellate Case No. 2022-001825
Case No.: 2019-CP-23-02554

TONIA RANKIN, Appellant,

v.

DYNAMIC INSPECTION SERVICES, LLC, RICHARD H. HOLMES, AUBREE M. LEWIS,
THE HARO GROUP OF KELLER WILLIAMS REALTY, RONALD K. BARTON and
ALLISON BARTON..... Respondents.

MOTION TO BE RELIEVED AS COUNSEL

The undersigned has acted as counsel for Ronald K. Barton and Allison Barton at the trial level in the above captioned matter. Consistent with Rule 407 of the Appellate Court Rules, and specifically, Rule 1.16(b) of the Rules of Professional Conduct, there is at least one ground which supports the permissive withdrawal of the undersigned counsel where: (b)(1) withdrawal can be accomplished without material adverse effect on the interest of the client; (b)(5) the client fails substantially to fulfill an obligation to the lawyer regarding the lawyer’s services or payment therefor and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled; (b)(6) the representation will result in an unreasonable financial burden on the lawyer or has been rendered unreasonably difficult by the client; and/or (b)(7) other good cause for withdrawal exists.

The undersigned attempted to resolve the bases for withdrawal in good faith to no avail. This Petition is filed in the early stages of the present appeal, and withdrawal can be accomplished without any material adverse effect on the interests of the Respondent.

By service of this Petition, opposing counsel is hereby notified of this petition.

Respectfully submitted,

Hyde Law Firm, P.A.

s/ Samantha N. Larkins

Max T. Hyde, Jr. (SCB #17014)

Samantha N. Larkins (SCB #102790)

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*ATTORNEYS FOR RONALD K. BARTON
AND ALLISON BARTON*

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CERTIFICATE OF SERVICE

Pursuant to Section (d)(1) of the Supreme Court’s Order RE: Methods of Electronic Filing and Service Under Rule 626 of the South Carolina Appellate Court Rules (As Amended May 6, 2022), the undersigned employee of Hyde Law Firm, P.A., counsel for the Respondents Ronald K. Barton and Allison Barton, does hereby certify that service of the Petition for Withdrawal of Counsel was made upon all counsel of record by email only at the below email addresses on this 7th day of February, 2023, as follows:

Tucker S. Player
tucker@playerlawfirm.com

Ryan Earhart
Ryan.earhart@earheartoverstreet.com

Alan Jones
Alan.jones@mgclaw.com

Hyde Law Firm, P.A.

s/ Samantha N. Larkins

Max T. Hyde, Jr. (SCB #17014)

Samantha N. Larkins (SCB #102790)

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is employed in the Law Office of Hyde Law Firm, P.
A. 360 E. Main Street, Spartanburg, South Carolina, South Carolina, and is a person of such age
and discretion as to be competent to serve papers.

That on February 7, 2023, she served a copy of the Petition for Withdrawal of Counsel
on the person hereinafter named by placing a copy in a postpaid envelope addressed to the
person named below at the place and address stated below, and by depositing said envelope and
contents in the United States Mail, and electronically.

Mr. Kevin Barton
Ms. Allison Barton
724 Bayshore Lane
Moore, SC 29369
Kevvo727@yahoo.com

By: 
Cindi Whitenight, Paralegal



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HYDE
LAW FIRM, P.A.

Max T. Hyde, Jr.
Samantha N. Larkins

February 7, 2023

The South Carolina Court of Appeals
c/o Ms. V. Claire Allen
1220 Senate Street
Columbia, SC 29201

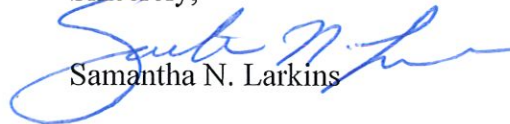
Re: *Tonia Rankin vs. Dynamic Inspections Services, LLC, Richard H. Holmes, Aubree M. Lewis, The Haro Group of Keller Williams Realty, Ronald K. Barton and Allison Barton*
Appellate Case No.: 2022-001825
Case No.: 2019-CP-23-02554

Dear Ms. Allen:

I have enclosed herewith a bound copy of the Petition for withdrawal of counsel, two (2) certificate of service, along with a check for filing fees in the amount \$50.00.

With kind regards, I am,

Sincerely,



Samantha N. Larkins

Enc.
SNL/cmww

Cc: Tucker S. Player
tucker@playerlawfirm.com
Ryan Earhart
Ryan.earhart@earheartoverstreet.com
Alan Jones
Alan.jones@mgclaw.com
Ronald K. Barton and Allison Barton
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