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**Feb 22 2023**

**SC Court of Appeals**

IN THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas  
The Honorable James E. Chellis, Master-In-Equity

Case No. 2020-CP-18-01848

BRE RETAIL NP FESTIVAL CENTRE )  
 OWNER, LLC, )  
 )  
 Respondent, )  
 )  
 v. )  
 )  
 BERNADETTE Y. BROWN )  
 and DARRELL M. BROWN, )  
 )  
 Appellants. )  
 \_\_\_\_\_ )

**MOTION TO WITHDRAW  
AS COUNSEL OF RECORD  
ON APPEAL**

NOW COMES Megan M. Stacy, Esq. and the law firm of Hall Booth Smith, P.C., pursuant to Rule 264 of the South Carolina Appellate Court Rules, and hereby collectively move to withdraw as counsel of record for the Respondent BRE Retail NP Festival Centre Owner, LLC, and in support thereof, state the following:

1. On or about August 10, 2021, Mrs. Stacy entered her appearance in the trial court below on behalf of Plaintiff/Respondent BRE Retail NP Festival Centre Owner, LLC. At that time, Mrs. Stacy was employed as an attorney for the law firm of Shumaker, Loop & Kendrick, LLP.
2. Mrs. Stacy is no longer employed by Shumaker, Loop & Kendrick, LLP, and is currently employed as an attorney with Hall Booth Smith, P.C.
3. Respondent is represented solely by Shumaker, Loop & Kendrick, LLP in connection with this appeal and in any future proceedings before the trial court below.

4. Attorney Christian H. Staples of Shumaker, Loop & Kendrick, LLP will continue to serve as counsel of record for Plaintiff/Respondent this case.

5. Accordingly, the withdrawal of Mrs. Stacy and Hall Booth Smith, P.C. as counsel for Respondent will not leave Plaintiff/Respondent without representation in this matter and will not cause any prejudice or delay.

WHEREFORE, for all of the reasons discussed above, and for good cause shown, the undersigned respectfully requests to be relieved as counsel of record for the Respondent in this matter.

This the 22nd day of February, 2023.



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Megan M. Stacy  
SC Bar No.: 102120  
Hall Booth Smith, P.C.  
11215 N. Community House Road, Suite 750  
Charlotte, NC 28277  
T: 980.949.7818  
[MStacy@hallboothsmith.com](mailto:MStacy@hallboothsmith.com)

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing **MOTION TO WITHDRAW AS COUNSEL OF RECORD ON APPEAL** was deposited in the United States Mail, postage prepaid, and addressed to Defendants as follows:

Bernadette Y. Brown  
Darrell M. Brown  
4214 Buck Creek Court  
North Charleston, SC 29420

This the 22nd day of February, 2023.



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Megan M. Stacy  
SC Bar No.: 102120  
Hall Booth Smith, P.C.  
11215 N. Community House Road, Suite 750  
Charlotte, NC 28277  
T: 980.949.7818  
[MStacy@hallboothsmith.com](mailto:MStacy@hallboothsmith.com)