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SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

**APPEAL FROM THE RICHLAND COUNTY
COURT OF COMMON PLEAS**

The Honorable Joseph M. Strickland, Master-in-Equity
Civil Action Number: 2014-CP-40-01805

Appellate Case No.: 2017-001795

Raglins Creek Farms, LLCRespondent,

vs.

Nancy Dunn MartinAppellant.

RESPONDENT’S MOTION TO SUBSTITUTE COUNSEL

Valerie Garcia Giovanoli (SC Bar 102524)
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ATTORNEYS FOR RESPONDENT

RESPONDENT’S MOTION TO SUBSTITUTE COUNSEL

Respondent, Raglins Creek Farms, LLC, hereby moves this Court, with Respondent’s consent, for an order substituting counsel pursuant to Rules 240 and 264, SCACR. Respondent has been represented by John Wells (of Baxley Pratt & Wells, P.A.) and M. Brent McDonald (of Bundy McDonald, LLC). Respondent has retained new counsel, Valerie Garcia Giovanoli & D. Ryan McCabe, Jr. of McCabe, Trotter & Beverly, P.C. John Wells and M. Brent McDonald should be relieved as counsel for this appeal, and Respondent wishes to substitute Valerie Garcia Giovanoli and D. Ryan McCabe, Jr., of McCabe, Trotter & Beverly, P.C., as counsel in place of John Wells and M. Brent McDonald. Therefore, Respondent respectfully requests that the Court enter an order substituting Valerie Garcia Giovanoli and D. Ryan McCabe, Jr. for John Wells and M. Brent McDonald as counsel for Respondent.

Respectfully submitted,

s/ Valerie Garcia Giovanoli
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March 6, 2023
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PROOF OF SERVICE

I hereby certify that on March 6, 2023, I served Respondent’s Respondents Motion to Substitute Counsel upon counsel for Appellant by delivering a copy of same by electronic service to the primary e-mail addresses listed in the Attorney Information System (AIS) as follows:

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