

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM OCONEE COUNTY
Master-in-Equity

The Honorable J. Cordell Maddox, Jr.

Appellate Case No.2022-001796
Case No. 2022-CP-37-00396

John’s Marine Service, Inc., Frances J. Ratliff, Edward J. Ratliff, Jr., James L. Ratliff, Lucretia B. Morgan, Sherri Akers Crisp, and Amy Cawthon,

.....Appellants,

v.

Oconee County Board of Zoning Appeals, Ridgewater Engineering & Surveying, LLC, Globe, a South Carolina Limited Partnership, and Farmes, a South Carolina Limited Partnership,

.....Respondents.

APPELLANTS’ MOTION TO RELIEVE COUNSEL

Pursuant to Rules 240, SCACR, the Appellants John’s Marine Service, Inc., Frances J. Ratliff, Edward J. Ratliff, Jr., James L. Ratliff, Lucretia B. Morgan, Sherri Akers Crisp, and Amy Cawthon (“Appellants”), by and through its undersigned counsel, hereby requests the Court of Appeals relieve Keith M. Babcock, Esquire as counsel for Appellants in this matter.

The basis for this Motion is that David L. Paavola, Counsel for Appellants, has moved firms and is now employed with Kenison, Dudley & Crawford, LLC. As such, David L. Paavola, Esquire will hereinafter be sole counsel for Appellants. Appellants consent to this change in

counsel.

THEREFORE, counsel requests that Keith M. Babcock, Esquire, be relieved of representation of the Appellants and be withdrawn as counsel.

KENISON, DUDLEY & CRAWFORD, LLC

s/David L. Paavola

David L. Paavola (S.C. Bar No. 100714)

Kenson, Dudley & Crawford, LLC

1122 Barnwell Street, Suite B

Columbia, SC 29201

Office: (864) 242-4899

Fax: (864) 242-4844

Email: Paavola@conlaw.com

Attorney for Appellants

March 7, 2023

s/ Keith M. Babcock

Keith M. Babcock (S.C. Bar No. 456)

LEWIS BABCOCK L.L.P.

P.O. Box 11208

Columbia, South Carolina 29211

(803) 771-8000

kmb@lewisbabcock.com

RECEIVED

Mar 08 2023

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM OCONEE COUNTY
Master-in-Equity

The Honorable J. Cordell Maddox, Jr.

Appellate Case No.2022-001796
Case No. 2022-CP-37-00396

John’s Marine Service, Inc., Frances J. Ratliff, Edward J. Ratliff, Jr., James L. Ratliff, Lucretia B. Morgan, Sherri Akers Crisp, and Amy Cawthon,

.....Appellants,

v.

Oconee County Board of Zoning Appeals, Ridgewater Engineering & Surveying, LLC, Globe, a South Carolina Limited Partnership, and Farnes, a South Carolina Limited Partnership,

.....Respondents.

PROOF OF SERVICE

I certify that I have served the Motion to Relieve Counsel on James W. Logan, Jr., counsel for Respondent Oconee County Board of Zoning Appeals, by email sent to his primary e-mail address listed in the Attorney Information System, logan@loganandjolly.com and on Larry C. Brandt and Andrew K. Holliday, counsel for Respondents, Globe, a South Carolina Limited Partnership, and Farnes, a South Carolina Limited Partnership, by email sent to their primary e-mail addresses listed in the Attorney Information System, lcb.brandtlawfirm@att.net and andrew@drwmlaw.com, on March 7, 2023. See attached email.

/s/ David L. Paavola
David Paavola (Bar No. 100714)
Kenison Dudley & Crawford, LLC
1122 Barnwell St.
Suite B
Columbia, SC 29201
paavola@conlaw.com
Attorney for Appellant

Columbia, South Carolina
March 7, 2023

From: [David Paavola](#)
To: [Jim Logan](#); lcb.brandtlawfirm@att.net; andrew@drwmlaw.com
Cc: [David Paavola](#); [Amanda Hammond](#)
Subject: John"s Marine - Motion to Relieve Counsel
Date: Tuesday, March 7, 2023 5:27:35 PM
Attachments: [20230307 Johns Marine Service - Motion to Relieve Counsel.pdf](#)
[Outlook-ci04ie1y.png](#)

Jim, Larry, Andrew,

Please see attached. This will be filed shortly.

Thanks,



David L. Paavola
Attorney
KENISON, DUDLEY & CRAWFORD, LLC
1122 Barnwell St., Suite B.
Columbia, SC 29201
Email: paavola@conlaw.com
Main: (864) 242-4899
Direct: (803) 251-9202
Website: www.conlaw.com

This email contains information that may be confidential and/or privileged. If you are not the intended recipient, or the employee or agent authorized to receive for the intended recipient, you may not copy, disclose or use any contents in this email. If you have received this email in error, please immediately notify the sender at Kenison, Dudley & Crawford, LLC by replying to this email and delete the original and reply emails. Thank you.