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MAR 13 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM THE WORKERS' COMPENSATION COMMISSION

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Appellate Case No. 2020-000351

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Gene Grady, Employee, Respondent,

v.

The Shaw Group, Employer, and Zurich American Insurance Company, Carrier, Appellants.

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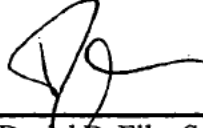
**MOTION TO BE RELIEVED AS COUNSEL**

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**THIS MATTER COMES** before the Court upon motion of Daniel B. Eller of Dan Eller Law Firm, LLC, and formerly of Eller Tonnsen Bach, LLC, who hereby moves this Court for an Order Relieving Counsel. The grounds for this Motion are that Mr. Eller is no longer with the firm of Eller Tonnsen Bach, LLC. Additionally, the firm Eller Tonnsen Bach, LLC has since changed its name to Tonnsen Bach Law Firm following Mr. Eller's departure. Mr. Eller was co-counsel with William F. Childers, Jr. of Tonnsen Bach Law Firm for the Appellants, and the insurance carrier for Appellants has requested that Tonnsen Bach Law Firm continue representation of Appellants through William F. Childers, Jr.

This Motion shall be further based upon any such additional information as may be deemed necessary and accepted by the Court.

Respectfully submitted,



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Daniel B. Eller S.C. Bar No. 73275  
Dan Eller Law Firm, LLC  
918 S. Pleasantburg Drive, Suite 231  
Greenville, South Carolina 29607  
(864)438-5708  
dan@dellerlawfirm.com

March 9, 2023  
Greenville, South Carolina

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PROOF OF SERVICE

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I certify that I have served the foregoing **Motion to be Relieved as Counsel** by depositing a copy of same via United States Mail, postage prepaid, on the 9<sup>th</sup> day of March, 2023, addressed to Respondent's attorneys of record as follows:

Malcolm M. Crosland, Jr.  
J. Kevin Holmes  
Steinberg Law Firm  
P.O. Box 9  
Charleston, SC 29402



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William F. Childers, Jr., S.C. Bar No. 100569  
TONNSEN BACH LAW FIRM  
1306 South Church Street  
Greenville, South Carolina 29605  
(864) 236-5013  
Attorney for Appellants



**TONNSEN BACH**  
LAW FIRM

William F. Childers, Jr.  
*Licensed in South Carolina and North Carolina*  
wchilders@tonnsenbach.com

1306 South Church Street  
Greenville, SC 29605  
Telephone (864) 236-5013  
Facsimile (864) 312-4191

March 9, 2023

**VIA U.S. MAIL**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

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**MAR 13 2023**  
**SC Court of Appeals**

*Re: Gene Grady v. The Shaw Group, Inc. and Zurich American Insurance Co.  
Appellate Case No. 2020-000351*

Dear Ms. Kitchings:

Enclosed please find a \$50.00 check for the filing fee associated with the enclosed Motion to be Relieved as Counsel in the above case along with proof of service of same. I appreciate your consideration. Please do not hesitate to contact me with any additional questions or concerns.

Sincerely yours,

TONNSEN BACH LAW FIRM

William F. Childers, Jr.

Enclosures

WFC/ktm

cc: Malcom Crosland, Jr. (via U.S. mail)  
J. Kevin Holmes (via U.S. mail)

 **TONNSEN BACH**  
LAW FIRM

1306 South Church Street • Greenville, SC 29605

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

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