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**Mar 28 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM THE GEORGETOWN COUNTY  
Court of Common Pleas

Walton J. McLeod, Circuit Court Judge

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Circuit Court Case No. 2021-CP-2200806

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Thomas M. Reown, Individually and  
As Parent and Natural Guardian of  
K.R., a Minor aged 11 years

Appellants,

v.

Lieutenant Joshua Smith and The  
Salvation Army of the Carolinas,

Respondents.

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CONSENT MOTION TO DISMISS APPEAL

March 28, 2023  
Charleston, South Carolina

/s/ Thomas S. Tisdale  
Thomas S. Tisdale, 5584  
Law Offices of Thomas S. Tisdale, LLC  
4 North Atlantic Wharf, Suite 100  
Charleston, South Carolina 29401  
(843) 823-4100  
tst@chancellorsc.com  
*Attorney for Appellants*

**MEMORANDUM**

Pursuant to Rule 240, SCACR, Appellants respectfully move to dismiss appeal against the Respondents. Further, counsel for the Respondents consents to this motion.

March 28, 2023  
Charleston, South Carolina

/s/ Thomas S. Tisdale  
Thomas S. Tisdale, 5584  
Law Offices of Thomas S. Tisdale, LLC  
4 North Atlantic Wharf, Suite 100  
Charleston, South Carolina 29401  
(843) 823-4100  
tst@chancellorsc.com  
*Attorney for Appellants*

WE CONSENT:

/s/ Wesley T. Moran  
Wesley T. Moran, 012797  
wes.moran@nelsonmullins.com  
3751 Robert M. Grissom Parkway/Suite 300  
PO Box 3939 (29578-3939)  
Myrtle Beach, SC 29577-6412  
(843) 448-3500  
G. Mark Phillips, 007945  
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151 Meeting Street, Suite 600  
Charleston, SC 29401  
(843) 853-5200  
*Attorney for Respondents*

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Thomas M. Reown, Individually and  
As Parent and Natural Guardian of  
K.R., a Minor aged 11 years Appellants,

v.

Lieutenant Joshua Smith and The  
Salvation Army of the Carolinas, Respondents.

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PROOF OF SERVICE

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I certify that I have served the Consent Motion to Dismiss Appeal unto the attorneys of record for Respondents Lieutenant Joshua Smith and The Salvation Army of the Carolinas, Wesley Moran and G. Mark Phillips, whose address is listed in the South Carolina Attorney Information System, on March 28, 2023.

March 28, 2023  
Charleston, South Carolina

/s/ Thomas S. Tisdale  
Thomas S. Tisdale, 5584  
Law Offices of Thomas S. Tisdale, LLC  
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(843) 823-4100  
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*Attorney for Appellants*

# THE LAW OFFICES OF THOMAS S. TISDALE

Attorney at Law

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March 28, 2023

**VIA EMAIL & US MAIL**

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

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**Mar 28 2023**

**SC Court of Appeals**

Re: *Thomas M. Reown, Individually and As Parent and Natural Guardian of K.R., a Minor aged 11 years v. Lieutenant Joshua Smith and The Salvation Army of the Carolinas*  
Appeal from Georgetown County Court of Common Pleas  
Georgetown County C/A No.: 2021-CP-2200806

To Whom It May Concern:

The Law Offices of Thomas S. Tisdale, LLC represents Thomas M. Reown, Individually and as Parent and Natural Guardian of K.R. a Minor aged 11 years, the Appellants in this matter.

Please find electronically enclosed for filing the Consent Motion to Dismiss Appeal and the Proof of Service on the Respondent,

A check in the amount of \$50.00 has been mailed to the South Carolina Court of Appeals for the filing of this Motion to Dismiss.

Sincerely,



Thomas S. Tisdale

/scp

Enclosures

cc: Wes Moran, Esquire (via email) G. Mark Phillips, Esquire (via email)