

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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SC Court of Appeals

99764

APPEAL FROM GREENVILLE COUNTY  
In the Circuit Court  
Greenville County Civil Action Number 2022-CP-23-00922

The Honorable William P. Keesley, Circuit Court Judge

Appellate Case No.: 2022-000741

Mercedes Boyd .....Appellant

v.

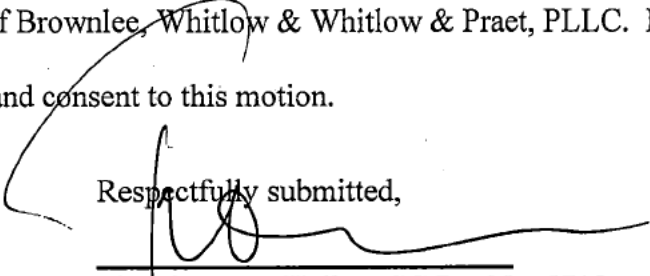
Triangle Palisades at the Park, LLC d/b/a Palisades at the Park .....Respondent

**RESPONDENT’S MOTION FOR SUBSTITUTION OF COUNSEL**

Pursuant to Rule 264 of the South Carolina Rules of Appellate Procedure, Respondent Triangles Palisades at the Park, LLC d/b/a Palisades at the Park (“Respondent”) hereby moves to the substitute Theodore von Keller of Crawford & von Keller, LLC as counsel for Respondent in place of Samantha Simpson of Brownlee, Whitlow & Whitlow & Praet, PLLC. Respondent and the attorneys have conferred and consent to this motion.

August 31, 2023

Respectfully submitted,



Theodore von Keller, SC Bar No. 5718  
Crawford & von Keller, LLC  
Post Office Box 4216  
Columbia, South Carolina 29250  
(803) 764-7444  
ted@crawfordvk.com

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Triangle Palisades at the Park, LLC d/b/a Palisades at the Park .....Respondent

**CERTIFICATE OF SERVICE**

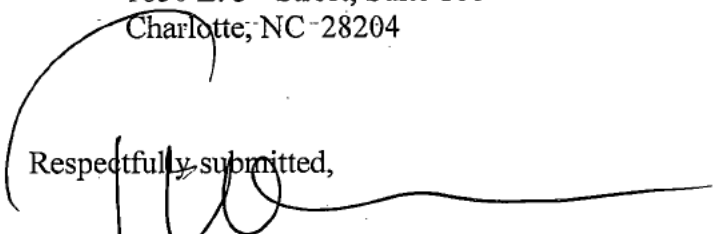
The undersigned certifies that he has served Respondent’s Motion for Substitution of Counsel Designation by depositing a copy of it in the United States Mail, postage prepaid, postage prepaid on August 31, 2023, addressed to the attorneys and parties of record to the below addresses:

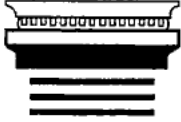
Mercedes Boyd  
805 Mauldin Road, Apt. 2306  
Greenville, South Carolina 29607

Samantha Simpson  
Brownlee, Whitlow & Praet, PLLC  
1850 E. 3<sup>rd</sup> Street, Suite 100  
Charlotte, NC 28204

August 31, 2023

Respectfully submitted,

  
Theodore von Keller, SC Bar No. 5718  
Crawford & von Keller, LLC  
Post Office Box 4216  
Columbia, South Carolina 29250  
(803) 764-7444  
ted@crawfordvk.com



# CRAWFORD & VON KELLER, LLC

SOUTH CAROLINA  
B. Lindsay Crawford, III \*  
Theodore von Keller  
B. Lindsay Crawford, IV\*\*

NORTH CAROLINA  
Benjamin A. Barco  
Arielle Womack  
Brittany T. Morrison\*\*

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Charley S. FitzSimons  
Jason M. Hunter  
Lawrence W. Johnson, Jr.\* - Special Counsel

\* Certified Specialist in Bankruptcy  
and Debtor-Creditor Law in SC

\*\*Admitted in South Carolina and North Carolina

August 31, 2023

Jenny Abbott Kitchens  
Clerk of Court  
SC Court of Appeals  
PO Box 11629  
Columbia, SC 29211

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**RE: Mercedes Boyd vs. Triangle Palisades at the Park, LLC  
Appellate Case No.: 2022-00741**

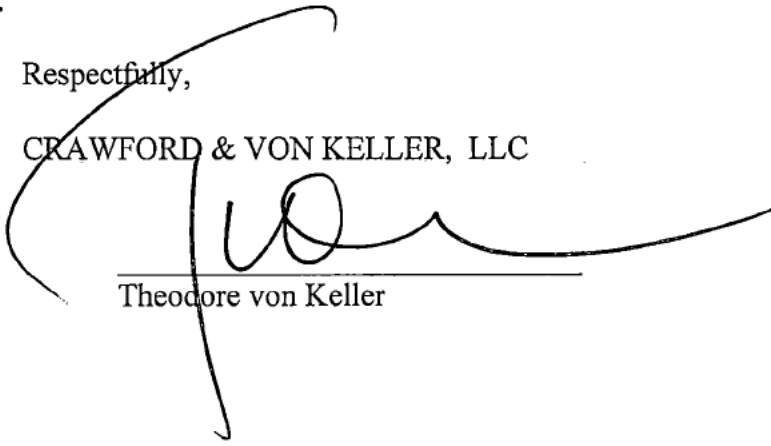
Dear Ms. Kitchens:

Please find enclosed one original and six (6) copies of the Respondent's Motion to Substitute Counsel.

Thank you, in advance, for your attention to this matter. Should you have any questions or concerns, please do not hesitate to contact me.

Respectfully,

CRAWFORD & VON KELLER, LLC



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Theodore von Keller

Enclosed: Check for \$50

Cc: M. Boyd (Appellant)

Crawford & von Keller, LLC  
P.O. Box 4216  
Columbia, SC 29240

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