

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

**Sep 18 2023**

**SC Court of Appeals**

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APPEAL FROM YORK COUNTY  
Court of Common Pleas

William A. McKinnon, Circuit Judge

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Case No. 2023-CP-46-02263  
Appellate Case No.: 2023-001341

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Lodges at Lake Wylie .....Respondent.

Dia Curry .....Appellant.

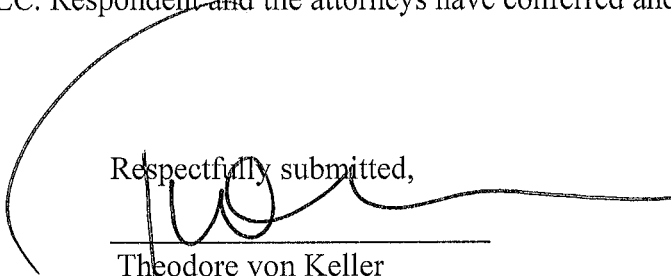
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**RESPONDENT'S MOTION FOR SUBSTITUTION OF COUNSEL**

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Pursuant to Rule 264 of the South Carolina Rules of Appellate Procedure, Respondent Lodges at Lake Wylie ("Respondent") hereby moves to substitute Theodore von Keller of Crawford & von Keller, LLC as counsel for Respondent in place of Jessica Lineberry of Loebsock and Brownlee, PLLC. Respondent and the attorneys have conferred and consent to this motion.

Respectfully submitted,



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Theodore von Keller  
S.C. Bar No. 5718  
Crawford & von Keller, LLC  
Post Office Box 4216  
Columbia, South Carolina 29250  
(803) 764-7444  
[ted@crawfordvk.com](mailto:ted@crawfordvk.com)  
Attorney for Respondent

September 15, 2023

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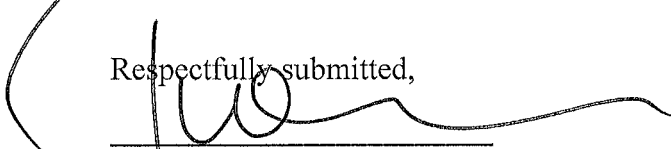
**CERTIFICATE OF SERVICE**

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, on September 15, 2023, addressed to the attorneys and parties of record to the below addresses:

Dia Curry  
150 Lodges Lane # 308  
Clover, SC 29710

Jessica Lineberry  
Loebsack & Brownlee, PLLC  
1850 E. 3<sup>rd</sup> Street, Suite 245  
Charlotte, NC 28204

Respectfully submitted,

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

September 15, 2023



## 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\*\*

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

\* Certified Specialist in Bankruptcy

\*\*Admitted in South Carolina and North Carolina  
and Debtor-Creditor Law in SC

September 15, 2023

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

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**SC Court of Appeals**

**RE: Lodges at Lake Wylie vs. Dia Curry**  
**Appellate Case No: 2023-001341**  
**Our file no.: 0145.23.0002**

Dear Clerk:

Enclosed please find Respondent's Motion for Substitution of Counsel in the above referenced matter. I have also enclosed a check for \$50.00 to cover the filing fee. Please file the original and return a clocked copy in the enclosed envelope.

Please contact me with any questions.

Sincerely,

Crawford & von Keller, LLC

Theodore von Keller

cc: Dia Curry  
150 Lodges Lane #308  
Clover, SC 29710

Jessica Lineberry  
Loebsack & Brownlee, PLLC  
1850 E. 3<sup>rd</sup>. Street, Suite 245  
Charlotte, NC 28204

**WE ARE A DEBT COLLECTOR. THIS COMMUNICATION IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.**

P.O. Box 4216, COLUMBIA, SC 29240 • 1640 ST. JULIAN PLACE, SC 29204 • 803-790-2626 • FACSIMILE 803-790-1277