

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Mikell R. Scarborough
Master-in-Equity

Appellate Case No. 2023-001562

The Broadband Companies, LLC, and
Fred Anthony,

Appellants

v.

R&R Landscape and Design, LLC, f/k/a
R&R Landscape, Inc., and Mark Gonzalez

Respondents.

MOTION TO BE RELIEVED
AS COUNSEL

COMES NOW the undersigned, pursuant to South Carolina Rule of Civil Procedure 11(b) and for good cause, moving this Court for an Order to relieve Mark Thomas Rainsford and Pierce, Sloan, Kennedy & Early, LLC with his consent as counsel for Respondents R&R Landscape and Design, LLC, f/k/a R&R Landscape, Inc., and Mark Gonzalez. Counsel Rainsford was previously engaged by Plaintiffs'/Respondents' counsel, Knowles Law Firm, PC and McCarty Law Firm, PC, to assist with post-judgment collection in the present matter, at which time he entered a Notice of Appearance on July 25, 2014 (*See* Exhibit 1). However, for a long period of time, Respondents were unable to locate Petitioners to serve them with a Rule to Show Cause. On September 18, 2015, the Court ordered that Plaintiffs/Respondents could refile at the time Defendants/Appellants

were located and dismissed the action without prejudice (*See* Exhibit 2). Counsel Rainsford has not been involved in this proceeding since that time, and his representation was terminated upon dismissal. Present counsel, including new counsel, Jesse Sanchez, were finally able to locate Defendants/Respondents and refiled a new post-judgment collection proceeding on or about July 15, 2022, almost 7 years after the first proceeding.

WHEREFORE as Counsel Rainsford's representation of Plaintiffs/Respondents ended in 2015 and Mr. Rainsford is not and has not been involved in this present proceeding, Mr. Rainsford should be relieved as counsel for Plaintiffs/Respondents.

[Signatures on following page]

Respectfully submitted,

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Attorney for Respondents
R&R Landscape and Design, LLC and Mark Gonzalez

November 7, 2023
Charleston, South Carolina 29407

I CONSENT:

PIERCE, SLOAN, KENNEDY & EARLY, LLC

s/M. Todd Rainford

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Prior Attorney for Respondents

R&R Landscape and Design, LLC and Mark Gonzalez

November 7, 2023

Charleston, South Carolina