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Nov 27 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Kristi F. Curtis, Circuit Court Judge

Appellate Case No. 2019-001943

Case No. 2018-CP-10-00666

Therese Hood,

Appellant,

v.

United Services Automobile Association,

Respondent.

MOTION TO BE RELIEVED AS COUNSEL

The undersigned is no longer employed by Poulin | Willey | Anastopoulo, LLC, and is no longer handling that firm's files. Therefore, pursuant to Rule 264, SCACR and the Court's correspondence of November 20, 2023 (attached below), she respectfully moves to be relieved as counsel in the eight (8) cases referenced above, that is:

- Appellate Case No. 2023-000143;
- Appellate Case No. 2023-001431;
- Appellate Case No. 2023-000718;
- Appellate Case No. 2022-001385
- Appellate Case No. 2022-001162;

- Appellate Case No. 2021-001304;
- Appellate Case No. 2020-000534; and
- Appellate Case No. 2019-001943.

As per the Court's correspondence, all parties are being served with this motion.

Respectfully submitted,

s/ Angeline M. Larrivee
Angeline M. Larrivee (S.C. #105466)
224 Beaver Run Lane
Williamston, SC 29697
(864) 404-1081
angelarrivee@protonmail.com

Williamston, South Carolina
November 27, 2023

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

William P. Keesley, Circuit Court Judge

Appellate Case No. 2023-000143

Case No. 2020-CP-32-00146

CONSTANCE MAYERS as Personal
Representative for the Estate of
Darrius “George” Dreher,

Appellant,

v.

Logan Bird, Samuel Bird, James Coleman
Hunter, Ayden Phillips, Kenneth Cole
Godley, Dominion Energy South Carolina,
Inc., Mark McMillan, and Kimberly
McMillan, Defendants,

of whom AYDEN PHILLIPS is the

Respondent.

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APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

Appellate Case No. 2023-001431

Case No. 2019-CP-10-02894

Roi Tan Enterprises LLC,

Respondent,

v.

Akim Anastopoulo and Anastopoulo Law
Firm, LLC,

Appellants.

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APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge

Appellate Case No. 2023-000718

Case No. 2019-CP-10-00061

Darleen Rash, Individually and as
Personal Representative for the Estate
of Bronson Harley Rash,

Appellant/Respondent,

v.

Dominion Energy (formerly South Carolina
Electric & Gas Company), Anthony M.
Akbar, and Paul Quattlebaum,

Respondents/Appellants.

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APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

Roger M. Young, Circuit Court Judge

Appellate Case No. 2022-001385

Case No. 2017-CP-08-02238

Matthew Zetz,

Appellant,

v.

Daniel Island Company, Inc.; Daniel Island
Community Foundation, Inc.; Daniel Island
Town Association, Inc.; Daniel Island
Community Association, Inc.; and MGR
Resources, Inc. d/b/a Moonlighting
Landscape Systems, Defendants,

of whom DANIEL ISLAND COMPANY,
INC. is the

Respondent.

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APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

Appellate Case No. 2022-001162

Case No. 2017-CP-10-04112

Chris Khamnei,

Appellant,

v.

Columbus Street Holdings,
LLC; Roy T. Willey, IV; and Eric
M. Poulin,

Respondents.

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APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

Grace Knie, Circuit Court Judge

Appellate Case No. 2021-001304

Case No. 2018-CP-42-00063

Betty McDade as Guardian *Ad Litem*
for Matthew McDade,

Appellant,

v.

Roger Caldwell,

Respondent.

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Bentley D. Price, Circuit Court Judge

Appellate Case No. 2020-000534

Case No. 2017-CP-10-05824

John Mayers,

Appellant,

v.

Konan Henthorn,

Respondent.

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APPEAL FROM LEXINGTON
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William P. Keesley, Circuit Court Judge

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CONSTANCE MAYERS as Personal
Representative for the Estate of
Darrius “George” Dreher,

Appellant,

v.

Logan Bird, Samuel Bird, James Coleman
Hunter, Ayden Phillips, Kenneth Cole
Godley, Dominion Energy South Carolina,
Inc., Mark McMillan, and Kimberly
McMillan, Defendants,

of whom AYDEN PHILLIPS is the

Respondent.

PROOF OF SERVICE

Pursuant to Rule 262(c), SCACR, I certify that I have served Angeline M. Larrivee’s Motion to Be Relieved as Counsel on Appellant and Respondent by Electronic Mail on November 27, 2023, addressed to Appellant’s attorneys of record (other than Angeline M. Larrivee): Roy T. Willey, IV, Eric Marc Poulin, Joseph E. Thoensen, and Kenneth George Goode, Jr.; and to Respondent’s attorney of record: Catharine Garbee Griffin.

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Roi Tan Enterprises LLC,

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v.

Akim Anastopoulo and Anastopoulo Law
Firm, LLC,

Appellants.

PROOF OF SERVICE

Pursuant to Rule 262(c), SCACR, I certify that I have served Angeline M. Larrivee's Motion to Be Relieved as Counsel on Appellants and Respondent by Electronic Mail on November 27, 2023, addressed to Appellants' attorneys of record (other than Angeline M. Larrivee): Julius Carnes Nicholson, III and Eric Marc Poulin; and to Respondent's attorney of record: Arthur Cole Pelzer.

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Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge

Appellate Case No. 2023-000718
Case No. 2019-CP-10-00061

Darleen Rash, Individually and as
Personal Representative for the Estate
of Bronson Harley Rash,

Appellant/Respondent,

v.

Dominion Energy (formerly South Carolina
Electric & Gas Company), Anthony M.
Akbar, and Paul Quattlebaum,

Respondents/Appellants.

PROOF OF SERVICE

Pursuant to Rule 262(c), SCACR, I certify that I have served Angeline M. Larrivee's Motion to Be Relieved as Counsel on Appellant/Respondent and Respondents/Appellants and Respondent by Electronic Mail on November 27, 2023, addressed to Appellant/Respondent's attorneys of record (other than Angeline M. Larrivee): Roy T. Willey, IV, Joseph E. Thoensen, and Michael Halbert Dill; to Respondent/Appellant Akbar's attorneys of record: Ian S. Ford, Hunter H. James, and Ainsley Fisher Tillman; to Respondent/Appellant Dominion's attorneys of record: M. Dawes Cooke, Jr., David Spence Cox, Chelsea A. Glover, George Craig Johnson, and

I.S. Leevy Johnson; and to Respondent/Appellant Quattlebaum's attorneys of record: Jenny Costa Honeycutt and Michael A. Timbes (with Nanette L. Wesley admitted *pro hac vice*).

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Appellant,

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Community Foundation, Inc.; Daniel Island
Town Association, Inc.; Daniel Island
Community Association, Inc.; and MGR
Resources, Inc. d/b/a Moonlighting
Landscape Systems, Defendants,

of whom DANIEL ISLAND COMPANY,
INC. is the

Respondent.

PROOF OF SERVICE

Pursuant to Rule 262(c), SCACR, I certify that I have served Angeline M. Larrivee's Motion to Be Relieved as Counsel on Appellant and Respondent by Electronic Mail on November 27, 2023, addressed to Appellant's attorneys of record (other than Angeline M. Larrivee): Roy T. Willey, IV, Eric Marc Poulin, and Lane Douglas Jefferies; and to Respondent's attorneys of record: Kenneth Michael Barfield and Diane Summers Clarke, II.

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Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

Appellate Case No. 2022-001162
Case No. 2017-CP-10-04112

Chris Khamnei,

Appellant,

v.

Columbus Street Holdings,
LLC; Roy T. Willey, IV; and Eric
M. Poulin,

Respondents.

PROOF OF SERVICE

Pursuant to Rule 262(c), SCACR, I certify that I have served Angeline M. Larrivee's Motion to Be Relieved as Counsel on Appellant by depositing a copy in the U.S. Mail, postage prepaid, on November 27, 2023, addressed to Appellant; and that I have served the same on Respondents by Electronic Mail on November 27, 2023, addressed to Respondent's attorney of record (other than Angeline M. Larrivee): Janek Christopher Kazmierski.

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Grace Knie, Circuit Court Judge

Appellate Case No. 2021-001304
Case No. 2018-CP-42-00063

Betty McDade as Guardian *Ad Litem*
for Matthew McDade,

Appellant,

v.

Roger Caldwell,

Respondent.

PROOF OF SERVICE

Pursuant to Rule 262(c), SCACR, I certify that I have served Angeline M. Larrivee's Motion to Be Relieved as Counsel on Appellant and Respondent by Electronic Mail on November 27, 2023, addressed to Appellant's attorneys of record (other than Angeline M. Larrivee): Roy T. Willey, IV, Eric Marc Poulin, Alexis Wimberly McCumber, and Matthew Thomas Foss; and to Respondent's attorney of record: Michael T. Coulter.

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Case No. 2017-CP-10-05824

John Mayers,

Appellant,

v.

Konan Henthorn,

Respondent.

PROOF OF SERVICE

Pursuant to Rule 262(c), SCACR, I certify that I have served Angeline M. Larrivee's Motion to Be Relieved as Counsel on Appellant and Respondent by Electronic Mail on November 27, 2023, addressed to Appellant's attorneys of record (other than Angeline M. Larrivee): Roy T. Willey, IV, Eric Marc Poulin, and Alexis Wimberly McCumber; and to Respondent's attorneys of record: Michael T. Coulter and William Joseph Horvath.

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Appellant,

v.

United Services Automobile Association,

Respondent.

PROOF OF SERVICE

Pursuant to Rule 262(c), SCACR, I certify that I have served Angeline M. Larrivee's Motion to Be Relieved as Counsel on Appellant and Respondent by Electronic Mail on November 27, 2023, addressed to Appellant's attorneys of record (other than Angeline M. Larrivee): Roy T. Willey, IV, Eric Marc Poulin, and Alexis Wimberly McCumber; and to Respondent's attorney of record: Robert William Whelan.

[SIGNATURE ON FOLLOWING PAGE]

Respectfully submitted,

s/ Angeline M. Larrivee

Angeline M. Larrivee (S.C. #105466)

224 Beaver Run Lane

Williamston, SC 29697

(864) 404-1081

angelarrivee@protonmail.com

Williamston, South Carolina

November 27, 2023

Service - Motion to be Relieved as Counsel

From angelarrivee@protonmail.com <angelarrivee@protonmail.com>

To roy@akimlawfirm.com, eric@akimlawfirm.com, joe@crowelafave.com, teamjefferies@poulinwilley.com, kenny@kggjlaw.com, cgriffin@brblegal.com, teamnicholson@poulinwilley.com, arthur@pelzerlawfirm.com, dill@laurentaylorlaw.com, ian.ford@fordwallace.com, hunter.james@fordwallace.com, ainsley.tillman@fordwallace.com, mdc@barnwell-whaley.com, dcox@barnwell-whaley.com, chelsea@jtbpa.com, george@jtbpa.com, islj@jtbpa.com, jenny@costahoneycutt.com, michael@tktlawyers.com, mbarfield@barnwell-whaley.com, sclarke@barnwell-whaley.com, janek@bergerlawsc.com, alexis.w.mccumber@gmail.com, mfoss@hodgelawfirm.com, upstatecoulter@clarksonwalsh.com, whorvath@turnerpadget.com, robbie@whelanmellen.com

CC tom.kyle@poulinwilley.com

Date Monday, November 27th, 2023 at 1:13 PM

Dear Counsel:

Attached for service, please find my Motion to be Relieved as Counsel in the following eight cases:

- Appellate Case No. 2023-000143;
- Appellate Case No. 2023-001431;
- Appellate Case No. 2023-000718;
- Appellate Case No. 2022-001385
- Appellate Case No. 2022-001162;
- Appellate Case No. 2021-001304;
- Appellate Case No. 2020-000534; and
- Appellate Case No. 2019-001943.

Thank you very much.

Sincerely,
Angeline Larrivee

Sent with [Proton Mail](#) secure email.

371.19 KB 1 file attached

Motion to be Relieved.pdf
371.19 KB