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Dec 11 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
COURT OF COMMON PLEAS

Appeal No.: 2022-000328

Mark Shaffer, as Personal Representative of the
Estate of Susan Shaffer,Appellant,

v.

DEH Disaster Recovery, LLC, Ceres Environmental
Services, Inc.; Beaufort County, A Political
Subdivision of the State of South Carolina;
Ryan Colter Stoltz; Matt T. Dotson; Tim Tod Dotson;
Brandi Dotson; Spencer A. Olson Trucking, LLC;
Buyers Products, Co.; and TruckPro, LLC, Defendants,

Of which Ceres Environmental Services, Inc. and
Beaufort County, A Political Subdivision of the
State of South Carolina are the Appellants-Respondents,

And Spencer A. Olson Trucking, LLC, DEH Disaster
Recovery, LLC, and Ryan Colter Stoltz are the Respondents.

**MOTION TO ALLOW WITHDRAWAL OF REPRESENTATION
AND SUBSTITUTION OF COUNSEL**

Pursuant to Rules 240 and 264(b), SCACR, Respondents DEH Disaster Recovery, LLC,
and Ryan Colter Stoltz hereby move this Court to allow Helen F. Hiser to withdraw from
representation of these Respondents in the above-captioned appeal as of December 31, 2023.
Ms. Hiser is retiring from the practice of law and, after December 31, 2023, will no longer be
with McAngus Goudelock & Courie. Respondents DEH Disaster Recovery, LLC, and Ryan
Colter Stoltz further move this Court to substitute Shawn M. Bevans of McAngus, Goudelock &
Courie, LLC, as counsel of record for them in place of Ms. Hiser.

December 11, 2023

Respectfully submitted,

MCANGUS GOUDELOCK & COURIE, LLC

s/Helen F. Hiser

Helen F. Hiser, S.C. Bar No.: 76124

Shawn M. Bevans, S.C. Bar No.: 100542

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*Attorneys for Respondents DEH Disaster Recovery, LLC,
and Ryan Colter Stoltz*

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Of which Ceres Environmental Services, Inc. and
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Recovery, LLC, and Ryan Colter Stoltz are the Respondents.

PROOF OF SERVICE

I certify that I have served Respondents DEH Disaster Recovery, LLC, and Ryan Colter Stoltz’s **Motion to Allow Withdrawal of Representation and Substitution of Counsel** on Appellants-Respondents Ceres Environmental Services, Inc. and Beaufort County, A Political Sub-Division of the State of SC, and other counsel of record on this day by emailing a copy of it as follows:

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Attorneys for Tetra Tech, Inc.

McANGUS GOUDELOCK & COURIE, LLC

December 11, 2023

s/Elizabeth Nettles

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Legal Assistant to Helen F. Hiser

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*Attorneys for Respondents DEH Disaster Recovery,
LLC and Ryan Colter Stoltz*



Reply To

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December 11, 2023

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SC Court of Appeals

Via S.C. Courts E-Filing & U.S. Mail

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

RE: Mark Shaffer, as Personal Representative of the Estate of Susan Shaffer, Deceased v. Ryan Colter Stoltz, DEH Disaster Recovery, LLC, Ceres Environmental Services, Inc., Beaufort County A Political Subdivision of the State of South Carolina, Matt T. Dotson, Tim Tod Dotson, Brandi Dotson, Dotson & Son Trucking, LLC, Spencer A. Olson Trucking, LLC, Buyers Products Company, TruckPro, LLC, ST Sales, LLC and Tetra Tech, Inc.
Civil Action No.: 2017-CP-07-01739 (Beaufort)
Date of Incident: May 3, 2017
Carrier Claim No.: 180204-GF
MGC File No.: 20302.17106
Appeal No.: 2022-000328

Dear Ms. Kitchings:

Enclosed please find the original of Respondents DEH Disaster Recovery, LLC and Ryan Colter Stoltz's Motion to Allow Withdrawal of Representation and Substitution of Counsel, and the Proof of Service in the above-referenced matter. We are serving counsel of record via email only.

We will send our firm's check in the amount of \$50 for filing the motion via U.S. Mail with a copy of this letter. Please do not hesitate to contact the undersigned if the Court requires additional copies and/or if you have any questions.

Yours truly,

McAngus Goudelock & Courie, LLC

Helen F. Hiser

Enclosures

cc: Counsel of Record (via email only)