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Dec 20 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

Appeal No.: 2022-000864

William D. Downes, Employee Respondent,

v.

Bon Secours Mercy Health, Inc., Employer,
Safety National Casualty Corporation, Carrier, Appellants.

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

Pursuant to Rules 240 and 264(b), SCACR, Appellants Bon Secours Mercy Health, Inc., and Safety National Casualty Corporation hereby move this Court to allow Helen F. Hiser to withdraw from representation of said Appellants 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. Appellants further move this Court to substitute Ashley Forbes of McAngus, Goudelock & Courie, LLC, as counsel of record for these Appellants in place of Ms. Hiser.

Respectfully submitted,

MCANGUS GOUDELOCK & COURIE, LLC

December 20, 2023

s/Helen F. Hiser

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

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*Attorneys for Appellants Bon Secours Mercy
Health, Inc., and Safety National Casualty
Corporation*

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PROOF OF SERVICE

I certify that I have served the Appellants' **Motion to Allow Withdrawal of Representation and Substitution of Counsel** on William D. Downes, by emailing them to his attorneys of record as follows:

Donald E. Kamb, Jr., Esq.
Williams & Kamb, LLC
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Attorneys for Respondent William D. Downes

MCANGUS GOUDELOCK & COURIE, LLC

December 20, 2023

By: s/Elizabeth Nettles
Elizabeth Nettles
Legal Assistant to Helen F. Hiser
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SC Court of Appeals

Reply To

HELEN F. HISER
Direct Dial: (843) 576-2930
helen.hiser@mgclaw.com

December 20, 2023

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

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RE: William Downes v. Bon Secours Mercy Health and Bon Secours Health System, Inc. c/o Cannon Cochran Management Services Inc
Date of Accident: April 17, 2018
WCC File No.: 1809996
Our File No.: 2024.22054
Claim No.: 18J28K142496
Appeal No.: 2022-000864

Dear Ms. Kitchings:

Enclosed for filing please find the Appellants' Motion to Allow Withdrawal of Representation and Substitution of Counsel, and the Proof of Service concerning the same.

Our check in the amount of \$50.00 for filing the Motion will be send via U.S. Mail with a copy of this letter.

If you have any questions, please contact me.

Very truly yours,



Helen F. Hiser

Enclosures

cc: Donald E. Kamb, Jr., Esq. (via Email only)
Joe Mooneyham, Esq. (via Email only)