

**RECEIVED**

**Dec 29 2023**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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APPEAL FROM FLORENCE COUNTY  
COURT OF COMMON PLEAS

H. Steven DeBerry, IV, Circuit Court Judge  
Civil Action Number: 2020CP2101817

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Appellate Case No.: 2023-001713

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Barbara Sarb .....Respondent/Appellant,

vs.

Julie W. Phillips and Joseph M. Phillips .....Appellants/Respondents.

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**MOTION TO WITHDRAW AND BE RELIEVED AS COUNSEL**

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Ely O. Grote hereby petitions the Court to be relieved as counsel for Respondent/Appellant, Barbara L. Sarb. This motion is being made because the undersigned attorney, Ely O. Grote, has accepted an offer to work for a governmental entity beginning January 2, 2024, and will be unable to continue representing Respondent/Appellant. The remaining attorney on record, Valerie Garcia Giovanoli, has worked in conjunction with the withdrawing attorney throughout this case, and will remain responsible in the representation of Respondent/Appellant for the remainder of this Appeal.

*[Signature page to follow]*

Respectfully submitted,

s/ Ely O. Grote

Ely O. Grote (75379)

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[Ely.Grote@McCabeTrotter.com](mailto:Ely.Grote@McCabeTrotter.com)

**Attorney for Respondent/Appellant**

s/ Valerie G. Giovanoli

Valerie Garcia Giovanoli (102524)

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**Attorneys for Respondent/Appellant**

December 29, 2023

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Court of Common Pleas

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Appellate Case No. 2023-001713  
Common Pleas Case No. 2020-CP-21-01817

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Barbara L. Sarb, Respondent-Appellant,

v.

Julie W. Phillips and Joseph M. Phillips, Appellants-Respondents.

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PROOF OF SERVICE

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I certify that I have served Respondent-Appellant's Motion to Withdraw and Be Relieved as Counsel on Julie W. Phillips and Joseph M. Phillips by emailing a copy to their attorneys of record, Edward A. Love and Robert T. King, on December 29, 2023, utilizing their email addresses listed in AIS as follows:

[elove@kingandlove.com](mailto:elove@kingandlove.com)

[rking@kingandlove.com](mailto:rking@kingandlove.com)

Valerie Garcia Giovanoli (SC Bar #102524)  
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(803) 724-5000  
Attorneys for Respondent-Appellant

**From:** [Marilyn Gomez](mailto:Marilyn.Gomez@kingandlove.com)  
**To:** ["elove@kingandlove.com"](mailto:elove@kingandlove.com); ["rking@kingandlove.com"](mailto:rking@kingandlove.com)  
**Cc:** [Valerie Giovanoli](mailto:Valerie.Giovanoli@kingandlove.com)  
**Subject:** 2023-001713 APPEAL Barbara Sarb v. Joseph & Julie Phillips  
**Date:** Friday, December 29, 2023 4:49:00 PM  
**Attachments:** [Motion to be Relieved - 2023-001713.pdf](#)  
[image001.png](#)  
[Proof of Service - 2023-001713.pdf](#)

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Good afternoon,

Attached and hereby served upon you please find Mr. Grote's Motion to Withdraw and be Relieved as Counsel and Proof of Service relative to the above-referenced matter.

Thank you.

*Marilyn Gomez*  
*Paralegal*  
*McCabe, Trotter & Beverly, P.C.*  
*4500 Fort Jackson Blvd, Suite 335*  
*Columbia, SC 29209*



McCABE, TROTTER & BEVERLY, P.C.

**PLEASE NOTE THAT OUR MAILING ADDRESS HAS CHANGED! OUR MAILING ADDRESS IS  
4500 FORT JACKSON BLVD., SUITE 250, COLUMBIA, SC 29209.**