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Jan 03 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHESTER COUNTY
Court of Common Pleas

The Honorable Brian M. Gibbons, Circuit Court Judge
The Honorable John C. Hayes III, Circuit Court Judge
The Honorable J. Mark Hayes, II, Circuit Court Judge

Appellate Case Nos.: 2022-001312 and 2022-001390

Heidi Gersten, Ivanka Ayoub, Daniel Hubbard..... Plaintiffs,
Of whom Heidi Gersten is the APPELLANT.

v.

Kevin Carter, Richard Davis, Joseph Tirbovich, Nationwide Insurance Company, Interinsurance
Exchange of the Automobile Club, John Ammendola, Trustguard Insurance Company, SC
Department of Public Safety, Chevrolet, GMC, Unknown Joe Does, RESPONDENTS.

**MOTION FOR SUBSTITUTION OF COUNSEL FOR RESPONDENTS NATIONWIDE
INSURANCE COMPANY AND JOSEPH TIRBOVICH**

PLEASE TAKE NOTICE that Jordyn N. D’Andrea, Esq. hereby enters her appearance as counsel for Respondents Nationwide Insurance Company (“Nationwide”) and Joseph Tirbovich (“Tirbovich”) in the above-captioned case.

Additionally, Pamela J. Larson, Esquire is no longer practicing at Womble Bond Dickinson (US) LLP. As a result, the responsibility for this matter on behalf of Respondents Nationwide Insurance Company and Joseph Tirbovich have been transferred within the firm of Womble Bond Dickinson (US) LLP to Attorney D’Andrea. Accordingly, Nationwide and Tirbovich respectfully move pursuant to SCACR 264(b) for an order permitting Pamela J. Larson to withdraw as counsel for Nationwide and Tirbovich in the above-captioned case.

Respectfully submitted this the 3rd day of January, 2024.

WOMBLE BOND DICKINSON (US) LLP

s/ Jordyn N. D’Andrea

Jordyn N. D’Andrea, Esq. (S.C. Bar No. 104953)

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*Attorney for Respondents Nationwide Insurance
Company and Joseph Tirbovich*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an attorney at law licensed to practice in the State of South Carolina, is the attorney for Respondents Nationwide Insurance Company and Joseph Tirbovich, and is a person of such age and discretion as to be competent to serve process.

That on January 3, 2024, she served a copy of the attached **MOTION FOR SUBSTITUTION OF COUNSEL FOR RESPONDENTS NATIONWIDE INSURANCE COMPANY AND JOSEPH TIRBOVICH** by emailing a copy of such to the following:

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s/ Jordyn N. D'Andrea

Jordyn N. D'Andrea, Esq.