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Jan 24 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM FAIRFIELD COUNTY
Court of Common Pleas

The Honorable Brian M. Gibbons
Circuit Court Judge

Civil Action No. 2022-CP-20-00104

Appellate Case No. 2023-001451

Bertha Goins, Respondent,

v.

Jenkinsville Water Company Inc., Appellant.

MOTION TO BE RELIEVED AS COUNSEL

PLEASE TAKE NOTICE that H. Thomas Morgan, Jr. hereby moves for an Order relieving Samantha Sanders Owens as counsel of record for Respondent Bertha Goins. The basis for this motion is that Ms. Sanders Owens is no longer employed with Smith Robinson Holler DuBose and Morgan, LLC.

Smith Robinson Holler DuBose and Morgan, LLC, and H. Thomas Morgan, Jr., Daniel Clifton Plyler, Austin Tyler Reed, and Sydney Jean Douglas will continue to represent Respondent Bertha Goins in Appellate Case No. 2023-001451. Please remove Samantha Sanders Owens from all future correspondence and appellate filings.

(signature page to follow)

SMITH | ROBINSON
Smith Robinson Holler DuBose and Morgan, LLC

s/H. Thomas Morgan, Jr.

H. Thomas Morgan, Jr. (SC Bar No. 73585)
tommy@smithrobinsonlaw.com
935 Broad Street
Camden, South Carolina 29020

ATTORNEYS FOR RESPONDENT

Camden, South Carolina

January 23, 2024

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PROOF OF SERVICE

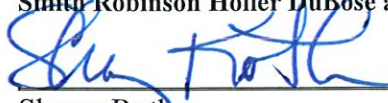
I, the undersigned paralegal of the law offices of Smith Robinson Holler DuBose and Morgan, LLC, do hereby certify that on January 23, 2024, I have served all counsel in this action with a copy of the pleading(s) hereinbelow in accordance with the Supreme Court’s Administrative Order by emailing a copy to each attorney listed below using their primary email address listed in the Attorney Information System.

Document Served: Motion to Relieve Counsel

Counsel Served: Via E-Mail Only
Thomas Jefferson Goodwyn, Jr., Esq.
jgoodwyn@goodwynlaw.com
Goodwyn Law Firm, LLC

Attorney for Appellant

SMITH | ROBINSON
Smith Robinson Holler DuBose and Morgan, LLC



Sherry Roth

Camden, South Carolina

January 23, 2024

Sherry Roth

From: Sherry Roth
Sent: Tuesday, January 23, 2024 4:47 PM
To: jgoodwyn@goodwynlaw.com
Cc: Tommy Morgan; Daniel C. Plyler; Austin Reed; Melissa S. Segear; Sydney Douglas; mbush@goodwynlaw.com
Subject: Goins v Jenkinsville Water Company Inc. (Appellate Case No. 2023-001451)
Attachments: Motion to Relieve Counsel.pdf; Proof of Service (01.23.24).pdf

Good afternoon, Counselor:

Please find attached the Motion to Relieve Counsel and Proof of Service in Goins v Jenkinsville Water Company, Inc., Appellate Case No. 2023-001451, which we are electronically filing with the Court of Appeals tomorrow.

If you have any questions, please let me know.

Thank you,
Sherry Roth

SMITHROBINSON
Forward thinking. Results driven.
Smith Robinson Holler DuBose and Morgan, LLC
www.SmithRobinsonLaw.com

Sherry Roth
Paralegal

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SMITH ROBINSON

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January 24, 2024

Via U.S. Mail and E-mail to: ctappfilings@sccourts.org

South Carolina Court of Appeals Clerk
1220 Senate Street
Columbia, SC 29201

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SC Court of Appeals

RE: Bertha Goins v. Jenkinsville Water Company, Inc.
Appellate Case No. 2023-001451

Dear Court of Appeals Clerk:

Enclosed please find a check in the amount of \$50.00 to cover the filing fee for the Motion to Relieve Counsel, which Motion was electronically filed by email on January 24, 2024, and served on all counsel of record.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



H. Thomas Morgan, Jr.
Sydney Douglas
Daniel C. Plyler
Austin T. Reed
ATTORNEYS FOR RESPONDENT

HTM/sr
Enclosure

cc: Thomas Jefferson Goodwyn, Jr., Esq (*via email only; w/o enclosure*)