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Mar 20 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Common Pleas Court

Carmen Mullen, Common Pleas Judge

Appellate Case No: 2021-000862

Zachary Z. Zoul, and Zoul Hospitality, LLC d/b/a Hospitality Advisors Group,
Respondents

v.

Lawrence Leary and Old Town Bluffton Inn, LLC,
Appellants.

MOTION TO WITHDRAWAL AS COUNSEL

Gregory Michael Galvin, Esq., moves the court for an order permitting withdrawal from representation of Lawrence Leary and the Old Town Bluffton Inn, LLC in this case. In support of the motion, Gregory Michael Galvin, Esq. shows the following to the court:

1. The client has not fulfilled the obligation to pay for the undersigned counsel's services and also simply fails to communicate with counsel after multiple attempts by counsel;
2. The client was given reasonable notice that the undersigned would withdraw;
3. Withdrawal is permitted under these circumstances pursuant to Rule 407 (1.16), SCACR;
4. The undersigned knows that the client is receiving his communications because after communications he will receive calls from persons calling on behalf of client related to the matter. However, under the ethical rules counsel cannot speak with these persons.
5. A proposed order allowing the withdrawal is attached as exhibit E.

WHEREFORE, the undersigned counsel moves the court to allow the undersigned counsel to withdraw from representation of Lawrence Leary and the Old Town Bluffton Inn, LLC.

GALVIN LAW GROUP, LLC

/s/ Gregory Michael Galvin, Esq.

Gregory Michael Galvin, Esq.

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Bluffton, South Carolina

29th day of **January, 2024**

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Appellants.

I hereby certify that I served a copy of the **MOTION TO WITHDRAWAL** electronically, or by mailing a true and correct copy of same to the following, with adequate postage affixed thereto, addressed as follows on the day set forth below:

Ward Borden, Esq.
Jones Simpson and Newton, PA
PO Box 1938
Bluffton, SC 29910
Attorney(s) for All Plaintiffs

South Carolina Office of Court Administration
1120 Senate Street, Suite 200
Columbia, S.C., 29201

Lawrence Leary
63 Honestly Lane
Bluffton, SC 29910
and Via Email

GALVIN LAW GROUP, LLC

/s/ Gregory Michael Galvin, Esq.

Gregory Michael Galvin, Esq.

P.O. Box 887

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Bluffton, South Carolina

30th day of January 2022