

RECEIVED

Mar 21 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Edward R. Miller, Circuit Court Judge

Appellate Case No. 2023-000144
Case No. 2022-CP-23-03356

Citizens for Quality Rural Living, Inc.,

Appellant,

v.

LyonJay and the Greenville County Planning Commission,

Respondents.

MOTION TO SUBSTITUTE COUNSEL

COME NOW attorneys for Respondent Greenville County Planning Commission, upon consent of all the undersigned counsel, and pursuant to Rule 264(b) of the South Carolina Appellate Court Rules and Rule 11(b) of the South Carolina Rules of Civil Procedure, to substitute attorney Christopher R. Antley of the Greenville County Attorney's Office for attorneys Anne R. Culbreath and Andrew N. Price of the law firm of Willson, Jones, Carter & Baxley, P.A. as attorney for Respondent Greenville County Planning Commission.

Anne R. Culbreath and Andrew N. Price are leaving the firm of Willson, Jones, Carter & Baxley, P.A. and therefore cannot continue to represent Respondent Greenville County Planning Commission in this matter. Counsel have notified Appellant and Co-Respondent counsel.

In making his appearance, Christopher R. Antley, as substituting counsel and

representative for Respondent Greenville County Planning Commission, requests all future correspondence between the parties or between the Court and the parties be directed to the address appearing below. Appellant's counsel and LyonJay's counsel consent to this motion.

Therefore, with justifiable cause shown and the consent of the client, the undersigned respectfully request that the Court grant this Motion to Substitute Counsel.

Respectfully submitted,

WE SO MOVE AND CONSENT:

WILLSON, JONES, CARTER & BAXLEY, P.A.

s/Andrew N. Price
Andrew N. Price, S.C. Bar No. 100976
325 Rocky Slope Road, Suite 201
Greenville, SC 29607
(864) 672-3714
anprice@wjcblaw.com

s/Anne R. Culbreath
Anne R. Culbreath, S.C. Bar No. 15536
325 Rocky Slope Road, Suite 201
Greenville, SC 29607
(864) 672-3713
arculbreath@wjcblaw.com

Withdrawing Attorneys for the Greenville County Planning Commission

I SO MOVE AND CONSENT:

GREENVILLE COUNTY ATTORNEY'S OFFICE

s/Christopher R. Antley
Christopher R. Antley, S.C. Bar No. 13631
301 University Ridge, Suite N-4000
Greenville, SC 29601
(864) 467-7110
cantley@greenvillecounty.org

Attorney for the Greenville County Planning Commission

March 21, 2024
Greenville, South Carolina

RECEIVED

Mar 21 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Edward R. Miller, Circuit Court Judge

Appellate Case No. 2023-000144
Case No. 2022-CP-23-03356

Citizens for Quality Rural Living, Inc.,

Appellant,

v.

LyonJay and the Greenville County Planning Commission,

Respondents.

CERTIFICATE OF SERVICE

I, the undersigned attorney for Respondent Greenville County Planning Commission, hereby certify that on March 21, 2024, I served counsel for Appellant Citizens for Quality Rural Living, Inc., and Co-Respondent LyonJay with a copy of Respondent Greenville County Planning Commission's Motion for Substitution of Counsel by emailing copies of the same to the following addresses registered in the South Carolina Attorney Information System:

Leslie S. Lenhardt, Esq.
S.C. Environmental Law Project
510 Live Oak Drive
Mt. Pleasant, SC 29464
Tel: (843) 527-0078
Fax: (843) 527-0540
leslie@scelp.org

Attorney for Citizens for Quality Rural Living, Inc.

William B. Swent, Esq.
William A. Neinast, Esq.
R. Taylor Speer, Esq.
Fox Rothschild, LLP
2 West Washington Street Suite 1100
Greenville, South Carolina 29601
Wswent@foxrothschild.com
Wneinast@foxrothschild.com
Tspeer@foxrothschild.com

Attorneys for LyonJay

/s/ Andrew N. Price
Anne R. Culbreath, S.C. Bar No. 15536
Andrew N. Price, S.C. Bar No. 100976
Willson Jones Carter & Baxley, P.A.
325 Rocky Slope Road, Suite 201
Greenville, South Carolina 29607
(864) 672-3713
(864) 672-3714

Counsel for Respondent
Greenville County Planning Commission

March 21, 2024
Greenville, South Carolina