

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM THE SOUTH CAROLINA  
ADMINISTRATIVE LAW COURT

69533

Shirley Robinson, Administrative Law Judge

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Case No. 2011-ALJ-17-0546-CC

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St. Clements Homeowner's Association,

Appellant,

v.

Be Mi, Inc., d/b/a St. Clements Beach  
Bar & Grill and South Carolina  
Department of Revenue,

Respondent,

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**MOTION FOR WITHDRAWAL AND  
SUBSTITUTION OF COUNSEL**

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The undersigned Attorney pursuant to Rules 264, SCACR, hereby moves for his withdrawal as Counsel for the Respondent and the substitution of Clifford L. Welsh as counsel for the Respondent for the purposes of this appeal. This Motion is made with the knowledge and consent of the Respondent as well as Attorney Welsh. Attorney was retained by the Respondent for the purpose of handling this appeal and has been representing the Respondent since the hearing

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**SC Court of Appeals**

that this appeal addresses. The undersigned does not practice in the appellant area and Attorney Welsh has done all of the work on this appeal.

The Respondent requests an Order of this Court allowing the withdrawal from this matter of Kenneth E. Allen and the substitution of Clifford L. Welsh as attorney for the Respondent Be Mi, Inc., d/b/a St. Clements Beach Bar & Grill.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'K. Allen', written over a horizontal line.

Kenneth E. Allen (SC Bar No. 0335)  
1201 Main Street, Suite 1980  
Columbia, South Carolina 29201  
(803) 748-1335  
kallenlaw@sc.rr.com  
Attorney for Respondent

August 20, 2013

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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ADMINISTRATIVE LAW COURT

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CERTIFICATE OF SERVICE

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The undersigned hereby certifies that on the date indicated below he served the other counsel of record, as well as Respondent, with a copy of the **Motion for Withdrawal and Substitution of Counsel** by mailing copies of the same by United States mail with first class postage prepaid to the following addresses:

James J. Corbett, Esquire  
Holler Law Firm  
Post Office Box 11006  
Columbia, South Carolina 29211  
Attorney for Appellant

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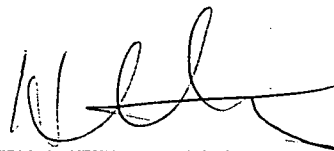
**SC Court of Appeals**

Kathryn Ray Brown, Esquire  
South Carolina Department of Revenue  
Post Office Box 12265  
Columbia, South Carolina 29211  
Attorney for Respondent SC Department of Revenue

Clifford L. Welsh, Esquire  
457 Main Street  
North Myrtle Beach, South Carolina 29582  
Appellate Attorney for Be Mi, Inc.

Mr. Raymond "Luke" Goude  
Be Mi, Inc.  
312 70<sup>th</sup> Avenue North  
Myrtle Beach, South Carolina 29572

Respectfully submitted,



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Kenneth E. Allen (SC Bar No. 0335)  
1201 Main Street, Suite 1980  
Columbia, South Carolina 29201  
(803) 748-1335  
kallenlaw@sc.rr.com  
Attorney for Respondent BeMi, Inc.

August \_\_\_\_, 2013