

RECEIVED

Jul 08 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPELLATE CASE NO. 2024-000256

BOARD OF FIELD OFFICERS OF THE FOURTH BRIGADE,
MARK CALHOUN,
F. PRESTON WILSON AND
ANDREW PICKENS CALHOUN,

..... Appellants,

v.

MEMBERS OF CITY COUNCIL OF THE CITY OF CHARLESTON, SOUTH CAROLINA,
CAROLINE PARKER, KEVIN SHEALY, JASON SAKRAN, ROBERT M. MITCHELL, KARL
L. BRADY, JR., STEPHEN BOWDEN, PETER SHAHID, JR., MICHAEL S. SEEKINGS, PERRY
K. WARING, WILLIAM DUDLEY GREGORIE, AND ROSS A. APPEL,
THE CITY OF CHARLESTON, SOUTH CAROLINA, THE HONORABLE ALAN WILSON,
ATTORNEY GENERAL FOR THE STATE OF SOUTH CAROLINA, AND
THE HONORABLE JOHN TECKLENBURG, MAYOR OF THE CITY OF CHARLESTON,
SOUTH CAROLINA,

..... Respondents.

ATTORNEY CONNOR’S MOTION TO WITHDRAW

WHEREAS, a potential conflict of interest has now arisen between one (and possibly two) of his clients Mark Calhoun, F. Preston Wilson and Andrew Pickens Calhoun, which he reasonably believes now requires him to seek withdrawal as counsel for all three as continued representation of any would create a potential conflict of interest against a former client in a same matter, and

WHEREAS, Preston Wilson is retaining separate counsel, namely Attorney Robert Merting, and

COMES NOW Attorney William M. Connor V, counsel for Appellants Mark Calhoun, F. Preston Wilson and Andrew Pickens Calhoun, who moves to withdraw as counsel of record in the instant Appeal.

Insofar as the Appellants' Initial Brief and the Designation of Matter Record was due for filing on or before July 12, 2024 and the undersigned has filed a motion for one additional thirty (30) day extension for Robert Merting's preparation and for the remaining clients to obtain new counsel or proceed *pro se*, this motion does not create undue hardship.

Respectfully submitted,

July 8, 2024

BILL CONNOR LAW FIRM, LLC.
s/ William M. Connor, V
William M. (Bill) Connor, V, S.C. Bar 71928
1408 Russell Street, Suite 11
Orangeburg, SC 29115
P: 803-937-5571 / F: 803-937-6647
office@billconnorlaw.com
Attorney for the Appellants:
Mark Calhoun, F. Preston Wilson, &
Andrew Pickens Calhoun

Other Counsel of Record:

Armand Derfner, Esquire
Jonathan S. Altman, Esquire
Derfner & Altman, LLC
575 King Street, Suite B
Charleston, SC 29403
aderfner@derfneraltman.com
jaltman@derfneraltman.com
Telephone: (843) 723-9804

William J. Cook, Esquire
Cultural Heritage Partners, PLLC
4370 Spring Island
Okatie, SC 29909
will@culturalheritagepartners.com
Telephone: (843) 801-3366

Kathleen F. Monoc, Esquire
Monoc Law, LLC
77 Grove Street
Charleston, SC 29403
katie@monoclaw.com
Telephone: (843) 790-8910

Attorneys for Respondents

Robert B. Varnado SC Bar # 07858
Post Office Box 387
Charleston, SC 29402
rob@varnado-law.com
Attorney for the Appellants:
Board of Field Officers

RECEIVED

Jul 08 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPELLATE CASE NO. 2024-000256

BOARD OF FIELD OFFICERS OF THE FOURTH BRIGADE,
MARK CALHOUN,
F. PRESTON WILSON AND
ANDREW PICKENS CALHOUN,

..... Appellants,

v.

MEMBERS OF CITY COUNCIL OF THE CITY OF CHARLESTON, SOUTH CAROLINA,
CAROLINE PARKER, KEVIN SHEALY, JASON SAKRAN, ROBERT M. MITCHELL, KARL
L. BRADY, JR., STEPHEN BOWDEN, PETER SHAHID, JR., MICHAEL S. SEEKINGS, PERRY
K. WARING, WILLIAM DUDLEY GREGORIE, AND ROSS A. APPEL,
THE CITY OF CHARLESTON, SOUTH CAROLINA, THE HONORABLE ALAN WILSON,
ATTORNEY GENERAL FOR THE STATE OF SOUTH CAROLINA, AND
THE HONORABLE JOHN TECKLENBURG, MAYOR OF THE CITY OF CHARLESTON,
SOUTH CAROLINA,

..... Respondents.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that *Attorney Connor's Motion to Withdraw* in the above referenced case has been served upon counsel of record by mailing a copy in an envelope properly addressed with postage prepaid on this day to the following, on the **July 8, 2024** or service via email if so indicated:

(remainder of page intentionally left blank)

Derfner & Altman, LLC
Armand Derfner
Jonathan S. Altman
575 King Street, Suite B
Charleston, SC 29403
aderfner@derfneraltman.com
jaltman@derfneraltman.com

VIA EMAIL

William J. Cook, Esquire
Cultural Heritage Partners, PLLC
4370 Spring Island
Okatie, SC 29909
will@culturalheritagepartners.com
Telephone: (843) 801-3366

VIA EMAIL

Kathleen F. Monoc, Esquire
Monoc Law, LLC
77 Grove Street
Charleston, SC 29403
katie@monoclaw.com
Telephone: (843) 790-8910

VIA EMAIL

Robert B. Varnado SC Bar # 07858
Post Office Box 387
Charleston, SC 29402
rob@varnado-law.com
Attorney for the Appellants:
Board of Field Officers

VIA EMAIL

July 8, 2024

BILL CONNOR LAW FIRM, LLC.

s/ William M. Connor, V
William M. (Bill) Connor, V, S.C. Bar 71928
1408 Russell Street, Suite 11
Orangeburg, SC 29115
P: 803-937-5571 / F: 803-937-6647
office@billconnorlaw.com
Attorney for the Appellants:
Mark Calhoun, F. Preston Wilson, &
Andrew Pickens Calhoun