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**Aug 09 2024**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
In The Court of Appeals**

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**APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas**

**The Honorable Bentley Price, Circuit Court Judge**

**Case No. 2024-000071**

**RONALD SOLES, .....Respondent,**

**v.**

**IOAN GHERMAN d/b/a USA AUTO TRANSPORT LLC, and  
JASON BROCKMAN d/b/a JNJ TRANSPORT, LLC, .....Defendants,  
Of whom JASON BROCKMAN d/b/a JNJ TRANSPORT, LLC is the .....Appellant.**

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**MOTION TO WITHDRAW AND BE RELIEVED AS COUNSEL FOR  
RESPONDENT RONALD SOLES**

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COMES NOW the undersigned counsel for Respondent, pursuant to Appellate Court Rule 264, to respectfully submit this Motion to Withdraw and Be Relieved as Counsel for Respondent Ronald Soles. In furtherance of this Motion, the undersigned counsel would respectfully show as follows:

1. This Motion comes at the request of the Respondent. Respondent consents to and has requested the relief sought and no longer desires representation by Attorney Craven moving forward.

August 8th, 2024

2. Additional grounds support the permissive withdrawal of the undersigned counsel, consistent with Rule 1.16(b) of the Rules of Professional Conduct, Rule 407, SCACR, which include but are not limited to:
  - a. Subpart (b)(5): The client fails substantially to fulfill an obligation to the lawyer regarding the lawyer's services or payment therefore and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled;
  - b. Subpart (b)(6): The representation will result in an unreasonable financial burden on the lawyer or has been rendered unreasonably difficult by the client; and/or,
  - c. Subpart (b)(7): Other good cause for withdrawal exists.
3. Prior to filing this Motion, the undersigned counsel advised Appellant's counsel of the relief sought by this Motion.
4. The undersigned has also filed a Motion to Withdraw and Be Relieved as Counsel for Respondent Ronald Soles in matters that remain pending in Circuit Court, if any.

WHEREFORE, having fully stated the basis for this Motion, the undersigned counsel respectfully request an Order from the Court which allows him to withdraw as counsel for the Respondent, and to allow Respondent a period of thirty (30) days from the date of such Order for the Respondent to secure new counsel, who may then make an appearance on behalf of the Respondent.

Respectfully submitted,

**s/James Stone Craven, Esq.**

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Attorneys for Defendant Ioan Gherman d/b/a USA Auto Transport, LLC

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Of whom JASON BROCKMAN d/b/a JNJ TRANSPORT, LLC is the .....Appellant.**

**PROOF OF SERVICE**

I certify that I have served the Motion to Withdraw and Be Relieved as Counsel on the attorney for the Appellant, Ward Benjamin McClain, Jr., Esquire, via his AIS email, pursuant to the Order of The Supreme Court Of South Carolina dated April 24, 2024.

Respectfully submitted,

**s/James Stone Craven, Esq.**

S.C. Bar No.: 69847

August 8th, 2024

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August 8th, 2024