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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

W. Jeffrey Young, Circuit Court Judge

Appellate Case No. 2013-000020

Keith Roberts and Lot 12 Yellow House, L.L.C.

Appellants,

v.

Randall J. Drew,

Respondent.

**CONSENT MOTION FOR ORDER OF PROTECTION**

Respondent's counsel Andrew W. Countryman, with the consent of Appellants' counsel (See Ex. A attached), hereby respectfully requests protection for the weeks of February 24, 2014 – March 14, 2014 to attend events related to his March 1, 2014 wedding.

August 23, 2013



CARLOCK, COPELAND & STAIR, LLP  
David W. Overstreet, Esq.  
State Bar No. 16965  
Andrew W. Countryman, Esq.  
State Bar No. 72700

40 Calhoun Street, Suite 400  
Charleston, SC 29401-3531  
(843) 727-0307

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AUG 27 2013

**SC Court of Appeals**

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Appellants,

v.

Randall J. Drew,

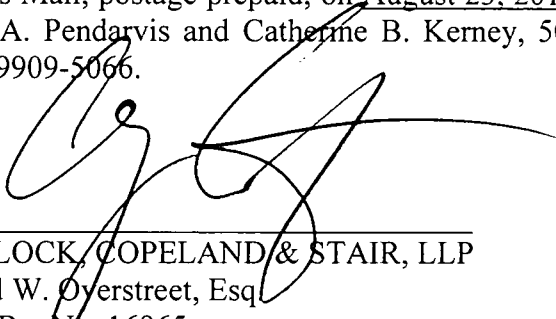
Respondent.

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**PROOF OF SERVICE**

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I certify that I have served the Appellants with a copy of the Consent Motion for Order of Protection by depositing a copy in the United States Mail, postage prepaid, on August 23, 2013, addressed to counsel for the Appellants, Thomas A. Pendarvis and Catherine B. Kerney, 500 Carteret Street, Suite A, Beaufort, South Carolina 29909-5066.



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**From:** Thomas A. Pendarvis <tpendarvis@pendarvislaw.com>  
**Sent:** Wednesday, August 21, 2013 12:17 PM  
**To:** MacKendrick, Tara M.; Carey Kerney  
**Cc:** Rash, Lindsey N.; Andrea Goodreau  
**Subject:** RE: Roberts v. Drew

Of course, no objections and please pass along my best wishes!

Regards,

**Thomas A. Pendarvis**  
**Pendarvis Law Offices, P.C.**  
500 Carteret St., Ste. A  
Beaufort, SC 29202-5066  
843.524.9500 tel  
843.524.9501 fax  
[Thomas@PendarvisLaw.com](mailto:Thomas@PendarvisLaw.com)  
[www.PendarvisLaw.com](http://www.PendarvisLaw.com)

Admitted in South Carolina and Georgia

Board Certified by the American Board of Professional Liability Attorneys in Legal Malpractice

Practice concentrated in lawyer professional responsibility matters (plaintiff lawyer-malpractice claims, law-firm dissolutions, and lawyer moves between firms).

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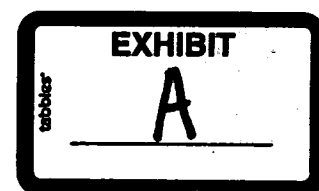
**From:** MacKendrick, Tara M. [<mailto:tmackendrick@carlockcopeland.com>]  
**Sent:** Wednesday, August 21, 2013 12:04 PM  
**To:** Thomas A. Pendarvis; Carey Kerney  
**Cc:** Rash, Lindsey N.  
**Subject:** Roberts v. Drew

Thomas & Carey:

Andy Countryman is requesting protection February 24-March 14, 2014, for his wedding and related events. If you wouldn't mind, and if you have no objection to his request, please let us know by responding to this e-mail.

Thanks,

Tara MacKendrick  
Legal Assistant  
Carlock, Copeland & Stair, LLP  
40 Calhoun Street, Suite 400  
Charleston, SC 29401  
Main Line: 843-727-0307  
Direct Dial: 843-329-8345



LAW OFFICES

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REPLY TO SC OFFICE

FACSIMILE  
843-727-2995

August 23, 2013

Jenny Abbott Kitchings, Clerk  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, South Carolina 29211

Re: Keith Roberts, *et al.* v. Randall J. Drew  
Appellate Case No. 2013-000020  
CCS File No.: 2950-43538

Dear Ms. Kitchings:

I represent the Respondent in this case. Enclosed please find an original and seven (7) copies of a Consent Motion for Order of Protection, as well as the \$25 filing fee. Please return a filed copy to our office in the self-addressed, stamped envelope enclosed.

If you have any questions or concerns, please do not hesitate to contact me.

Best regards,

ANDREW W. COUNTRYMAN

AWC:tmm

Enclosures

cc: Thomas A. Pendarvis, Esq.  
Catherine B. Kerney, Esq.

**RECEIVED**

AUG 27 2013

**SC Court of Appeals**