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**Oct 24 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
G.D. Morgan Jr., Circuit Court

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Appellate Case No.: 2024-001071

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Stephanie Chappell, ..... Appellant,

vs.

Johnny Mack Brown , ..... Respondent.

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**MOTION TO BE RELIEVED**

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Counsel for Appellant hereby moves to be relieved as counsel in the above filed appeal. There has become a significant conflict between the parties, culminating with Appellant's recent notification of termination of counsel and request for her file, along with her continued insistence on pursuing legal remedies that are not recoverable.

Appellant has insisted on presenting a claim or defense that is not warranted under existing law and cannot be supported by a good faith argument; throughout the litigation of this claim has made it unreasonably difficult to carry out the firm's representation, and now Appellant has demanded her file and advised counsel's staff that the firm is terminated. Counsel would join in Appellant's request and respectfully seek the Court's relief in granting this motion.

This relief and extension will not prejudice the rights of any of the other parties. Further, Counsel would request additional time for Appellant to secure other counsel to resume the pursuit of this pending appeal filed on behalf of Appellant.

Counsel for the Respondent has been notified of Appellant's intent to file this motion, without objection.

**PETTUS | FARNSWORTH, LLC**

BY: /s/ Daniel J. Farnsworth, Jr.  
Daniel J. Farnsworth, Jr.  
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Telephone (864) 250-9119  
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Greenville, South Carolina

October 9, 2024



Lauren Lipscomb &lt;lauren@farnsworthlawoffices.com&gt;

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**Chappell**

2 messages

**Lauren Lipscomb** <Lauren@farnsworthlawoffices.com>

Wed, Aug 28, 2024 at 2:32 PM

To: Russell Harter &lt;rwjhr@chhlaw.net&gt;, Dan Farnsworth &lt;Dan@farnsworthlawoffices.com&gt;, Patty Sanders &lt;psanders@chhlaw.net&gt;, Shelby Flagg &lt;Shelby@farnsworthlawoffices.com&gt;

Rusty and Patty-

I hope you are well. Dan wanted me to reach out. Our client came in and said she wanted to terminate Dan and wanted her file, and we have advised her that an appeal is pending. Dan is in his third day of a trafficking case in Greenville General Sessions. We also have a separate appellate brief due tonight as well.

How do you suggest we move forward till we can work this situation out with our client? We are unsure on how to proceed. My communication with Dan is limited currently due to him being in trial.

**Also, would you approve another 30 day extension for the reasons above?**

Best,

Lauren

--

Lauren O. Lipscomb  
Firm Manager and Senior Litigation Paralegal to  
Daniel J. Farnsworth, Jr.  
**Pettus | Farnsworth, LLC**  
211 Pettigru Street (29601)  
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INJURY LAW and WRONGFUL DEATH  
NURSING HOME ABUSE

CRIMINAL LAW and DUI DEFENSE

## POLICE MISCONDUCT

EMPLOYMENT LAW  
and BUSINESS LITIGATION

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**Russell Harter** <rw hjr@chhlaw.net>

Wed, Aug 28, 2024 at 2:40 PM

To: Lauren Lipscomb &lt;Lauren@farnsworthlawoffices.com&gt;

Cc: Dan Farnsworth &lt;Dan@farnsworthlawoffices.com&gt;, Patty Sanders &lt;psanders@chhlaw.net&gt;, Shelby Flagg &lt;Shelby@farnsworthlawoffices.com&gt;

Well, how to proceed will have to be Dans call not mine. When is your filing due in this case? Is it today? if you decide to file for an extension, it would seemingly be appropriate to have other counsel substituted at that time.? if there is a substitution of counsel and /or if Dan is withdrawing, I would not oppose an additional extension and consent under terms as the Appellate court may allow... Hope this answers your question. Please call my cell if you need clarification or any other information. Thank you.

Rusty

Russell W. Harter, Jr.  
Chapman, Harter & Harter, PA  
[14 Lavinia Avenue](#)  
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Greenville, SC 29601  
Main: (864) 233-4500  
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On Aug 28, 2024, at 2:32 PM, Lauren Lipscomb <Lauren@farnsworthlawoffices.com> wrote:

[Quoted text hidden]

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**CERTIFICATE OF SERVICE**

The undersigned paralegal of **PETTUS | FARNSWORTH, LLC** counsel for the Appellant, does hereby certify that of the Appellant, does hereby certify that the Appellant’s Motion for Additional Time to File and Motion for Relief of the Court’s Order dated June 7, 2024 in the above-captioned matter was sent by electronic mail, as the below listed addresses clearly indicated on said envelopes this the 24<sup>th</sup> of October, 2024.

Russell W. Harter, Jr.  
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Post Office Box 10224 (29603)  
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rwhjr@chhlaw.net

/s/ Lauren O. Lipscomb  
Lauren Olivia Lipscomb  
Senior Litigation Paralegal to  
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