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Oct 29 2024

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE BEAUFORT COUNTY
COURT OF COMMON PLEAS

HONORABLE R. FERRELL COTHRAN, JR.

CASE NO.: 2019-CP-07-01995

Ronnie Douglas,
Eric J. Douglas,
Jacqueline Walker,
Donna Harding, and
Diane Brenda Spears,

Appellants,

vs.

Kevin Holmes

Respondent.

MOTION TO BE RELIEVED AS COUNSEL

YOU WILL PLEASE TAKE NOTICE THAT that pursuant to Rule 11(b), SCRCP, Rule 1.16(b)(7), RPC, Rule 407, SCACR, Christopher W. Lempesis, Jr., Esq. on behalf of James H. Moss, an attorney of record for Plaintiff, Ronnie Douglas ("Plaintiff"), makes this limited appearance to move the South Carolina Court of Appeals, 1220 Senate Street Columbia, SC 29201, on the Third (3rd) day of service hereof, or as soon as counsel can be heard, for an Order relieving James H. Moss, as attorney of record for Plaintiff in Civil Action No. 2019-CP-07-01995 and Appellate Action No. 2022-001600.

Plaintiff Ronnie Douglas is being served with a copy of this Motion via US Mail, Certified, Return Receipt Requested, and via email.

MOTION

The grounds for this motion are founded in Rule 1.16(b)(7), RPC, Rule 407, SCACR, and for other good cause as will be shown in the event the Court requests an in-camera review to protect confidentiality concerns. Counsel further moves for an Order of this Court providing appropriate protection to ensure sufficient time for Plaintiff to secure new counsel.

WHEREFORE, Christopher W. Lempesis, Jr., on behalf of James H. Moss moves for an Order relieving Mr. Moss as counsel for record for the Plaintiff in the above captioned case and for the Court to provide Plaintiff sufficient time to find successor counsel.

Respectfully submitted,

LEMPESIS LAW FIRM, LLC

/s Christopher W. Lempesis, Jr.
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October 29, 2024

Beaufort, South Carolina