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Nov 20 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM ANDERSON COUNTY
CIRCUIT COURT

R. Lawton McIntosh, Circuit Court Judge

Circuit Court Case No.: 2020-CP-04-00085
Appellant Case No. 2024-001911

Moats Construction, Inc.....Appellant,

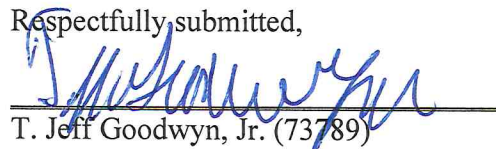
vs.

Anderson County, Rusty Burns, Matt Schell, and Holt Hopkins.....Respondent.

MOTION TO BE RELIEVED AS COUNSEL

YOU WILL TAKE NOTICE that T. Jeff Goodwyn Jr. and the Goodwyn Law Firm, LLC, hereby moves before the Court for an Order allowing them to withdraw as counsel of record for Appellant. The undersigned previously filed his Motion to be Relieved in the Circuit Court matter which was granted on November 7, 2024, prior to the filing of the Notice of Appeal filed November 12, 2024 and has no responsibility for this action which is solely being handled by attorney, David Lee Paavola, Esquire.

Respectfully submitted,



T. Jeff Goodwyn, Jr. (73789)
2309 Devine Street
Columbia, South Carolina 29205
(803) 251-4517
(803) 251-4527 Facsimile
jgoodwyn@goodwynlaw.com
Attorney for Appellant

November 20, 2024
Columbia, South Carolina

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PROOF OF SERVICE

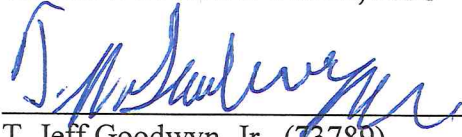
I certify that I have served a copy of the **Motion to be Relieved**, upon; the following, at the address(es) below by E-mailing a copy of same, on November 20, 2024.

David Lee Paavola, Esquire
1122 Barnwell Street – Ste. B
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paavola@conlaw.com
Attorney for Appellant

John W. Davidson, Esquire
P.O. Drawer 2426
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jdavidson@nexsenpuretc.com
Attorney for Respondent Anderson County

J. Victor McDade, Esquire
PO Box 2125
Anderson, South Carolina 29622
jvmcdade@dotmlaw.com
Attorney for Respondent Rusty Burns, Matt Schell and Holt Hopkins

GOODWYN LAW FIRM, LLC

A handwritten signature in blue ink, appearing to read "T. Jeff Goodwyn, Jr.", is written over a horizontal line.

T. Jeff Goodwyn, Jr., (73789)

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Attorney for Appellant

Columbia, South Carolina
November 20, 2024

T. Jeff Goodwyn, Jr.*†
Charles G. Blackburn**
Jefferson D. Turnipseed**

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*Also Licensed in Georgia
† Certified Circuit Court Mediator
** Of Counsel

November 20, 2024

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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SC Court of Appeals

RE: *Moats Construction, Inc. v Anderson County, Rusty Burns, Matt Schell and Holt Hopkins*
Civil Action No.: 2024-CP-04-00085
Appellate Case No.: 2024-001911
Our File No.: 3000-0519

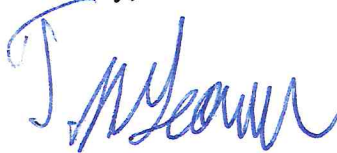
Dear Ms. Kitchings:

Enclosed please find an original and one (1) copy of a Motion to be Relieved and Proof of Service, along with a check in the amount of \$50.00 made payable to the "Clerk of Court" for filing in connection with the above-referenced matter. Please file the original and return a filed copy in the self-addressed stamped envelope provided.

As evidenced in the Proof of Service, I have served all interested parties, with a copy.

Thank you for your attention to this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG:cnc

Enclosures

cc: David Lee Paavola, Esquire
John W. Davidson, Esquire
J. Victor McDade, Esquire
(all via email)