

RECEIVED

Nov 19 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

Appellate Case No. 2022-000655

Emmitt R. Gunnells,..... Appellant,

v.

Galey & Lord Industries,..... Employer,

and

SC Insurance Guaranty Assoc.,..... Respondents.

**MOTION TO ALLOW WITHDRAWAL OF REPRESENTATION AND
SUBSTITUTION OF COUNSEL**

Pursuant to Rules 240 and 264(b), SCACR, Respondents Galey & Lord Industries and the South Carolina Insurance Guaranty Association hereby move this Court to allow Vernon F. Dunbar, Esquire, to withdraw from representation of Respondents in the above-captioned appeal as of November 19, 2024 due to his departure from McAngus Goudelock & Courie. Respondents further move this Court to substitute D. Tyler Hembree, Esquire, of McAngus Goudelock & Courie, LLC to be substituted as counsel of record for it in place of Mr. Dunbar.

Respectfully submitted,

McANGUS GOUDELOCK & COURIE, LLC

A handwritten signature in black ink that reads "Vernon F. Dunbar". The signature is written in a cursive style with a horizontal line extending from the end of the name.

November 19, 2024

Vernon F. Dunbar
Post Office Box 2980
201 West McBee Avenue, 2nd Floor (29601)
Greenville, South Carolina 29602
(864) 239-4000
Attorneys for Respondent

D. Tyler Hembree
Post Office Box 2980
201 West McBee Avenue, 2nd Floor (29601)
Greenville, South Carolina 29602
(864) 239-4000
Attorneys for Respondents Galey & Lord Industries
and SC Insurance Guaranty Association

RECEIVED

Nov 19 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

Appellate Case No. 2022-000655

Emmitt R. Gunnells,..... Appellant,

v.

Galey & Lord Industries,..... Employer,

and

SC Insurance Guaranty Assoc.,..... Respondents.

CERTIFICATE OF SERVICE

I hereby certify that I have this 19th day of November, 2024, caused to be served a copy of Respondents' Motion to Allow Withdrawal of Representation and Substitution of Counsel by electronic transmission a copy of same, as follows:

Stephen J. Wukela, Esquire
Wukela Law Firm
PO Box 13057
Florence, SC 29504-3057
stephen@wukelalaw.com



Vernon F. Dunbar
McAngus, Goudelock & Courie LLC
Post Office Box 2980
55 East Camperdown Way, Suite 300 (29601)
Greenville, South Carolina 29602
(864) 239-4000
Attorneys for Respondents



Reply To
D. TYLER HEMBREE
Direct Dial: (864) 239-6824
Tyler.Hembree@mgclaw.com

November 19, 2024

VIA EMAIL and U.S. Mail

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

RE: Emitt R. Gunnells v. Galey & Lord Industries and SC Insurance Guaranty
Association
Our File No.: 2039.24002
Appeal No.: 2022-000655

Dear Ms. Kitchings:

Enclosed for filing please find the Galey & Lord Industries and the South Carolina Insurance Guaranty Association's Motion to Allow Withdrawal of Representation and Substitution of Counsel, and the Proof of Service concerning the same.

Our check in the amount of \$50.00 for filing the Motion will be sent via U.S. Mail with a copy of this letter.

If you have any questions, please contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read 'D. Tyler Hembree'.

D. Tyler Hembree

cc: Stephen J. Wukela, Esquire