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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

APPEAL FROM THE SOUTH CAROLINA
COURT OF APPEALS

APPELLATE CASE NO. 2022-001546

Monica Murphy,

Appellant,

v.

Halocarbon Products Corporation, Employer and
Commerce & Insurance Company c/o AIG Claims, Inc.,

Respondent.

MOTION TO WITHDRAW AS COUNSEL AND TO STAY

Pursuant to Rule 240, SCACR, the undersigned counsel for the Appellant moves to withdraw as counsel for Appellant Monica Murphy. This motion is made pursuant to S.C. R. App. P. 407 (Rules 1.16(b)(4) and 1.16(b)(6) of the South Carolina Rules of Professional Conduct). Consistent with the applicable rules, the undersigned respectfully requests that this Court grant his motion based upon the following:

1. The Appellant, Monica Murphy, retained the undersigned to represent her in her Workers' Compensation case in 2015.
2. The Appellant filed a Motion to Extend Time to Petition for *Writ of Certiorari* which was granted by the Supreme Court of the State of South Carolina on January 2, 2025.

3. The undersigned makes attestation that representation of the Appellant has been rendered “unreasonably difficult by the client” in addition to the Appellant’s insistence “upon taking action...with which the lawyer has a fundamental disagreement.” Rules 1.16(b)(4) and 1.16(b)(6), South Carolina Rules of Professional Conduct.
4. The undersigned certifies that he has not consulted with the Appellant as such consultation with serve no useful purpose.
5. The undersigned certifies that he sent the Appellant a copy of this motion to both her electronic and street mailing addresses.

Additionally, the undersigned additionally moves for an Order to Stay time to file the petition for *writ of certiorari* pursuant to Rule 240 for a stay in this matter for a reasonable time of up to ninety (90) days to allow the Appellant time to obtain new counsel.

For the reasons set forth herein, the undersigned counsel moves for an Order to be relieved of counsel and for an Order to stay the petition for an additional ninety (90) days.

Respectfully Submitted,

BY:


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January 13, 2025