

**RECEIVED**

**Jan 23 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

The Honorable Letitia H. Verdin

APPELLATE CASE NO. 2023-000353

Jason Tuck.....Appellant,

v.

On the Mark Automotive Repair and Refinishing, LLC d/b/a On the Mark Automotive, LLC, Carolina’s Best Auto Sales, LLC, Carolina’s Best Finance, 828A St. Mark Road, LLC, Affordable Auto Finance, Inc., Southeastern Recovery and Towing, LLC, John D. Watts III (a/k/a John D. Watts).....Respondents.

**MOTION TO BE RELIEVED AS COUNSEL**

The undersigned counsel for Respondent On the Mark Automotive Repair and Refinishing, LLC d/b/a On the Mark Automotive, LLC hereby moves before this Honorable Court for an Order relieving the undersigned counsel on the grounds that he is not retained to represent On the Mark Automotive, LLC in the appeal. Respondent On the Mark Automotive, LLC will suffer no prejudice if this motion is granted because it still has counsel of record. On the Mark Automotive, LLC has been notified of this motion and has no objection.

Respectfully submitted,

**s/Chad M. Graham**

Chad M. Graham (SC Bar #79859)

The Ward Law Firm, PA

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**PROOF OF SERVICE**

I certify that I have served the Motion to be Relieved as Counsel submitted by Chad S. Graham to the Court of Appeals in the above matter, to the parties and/or counsel of record on January 9, 2025, as follows:

**VIA AIS E-Mail**

Brian Patrick Murphy, Esquire  
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**VIA U.S. MAIL**

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118 South Pleasantburg Drive  
Greenville, SC 29607

**VIA U.S. MAIL**

John D. Watts  
118 South Pleasantburg Drive  
Greenville, SC 29607

*s/ Erin V. Hall*

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January 22, 2025

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January 22, 2025

VIA E-MAIL: [ctappfilings@sccourt.org](mailto:ctappfilings@sccourt.org)  
Jenny Abbott Kitchings, Clerk of Court  
SC Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**  
**Jan 23 2025**  
**SC Court of Appeals**

**Re: Jason Tuck vs. On the Mark Automotive**  
**Appellate Case No.: 2023-000353**

Dear Ms. Kitchings:

Please find attached for filing the **Motion to be Relieved as Counsel** being submitted by Chad M. Graham. Also enclosed for filing is the **Proof of Service** for the same. The corresponding filing fee for the same is being placed in the mail to the Court.

Should you have any questions, please do not hesitate to contact our office.

Yours truly,  
**The Ward Law Firm, P.A.**

*Erin V. Hall*

Erin V. Hall  
Paralegal to Chad M. Graham

/evh  
Enclosures (as stated)

cc: Southeastern Recovery and Towing, LLC (Via U.S. Mail)  
John D. Watts (Via U.S. Mail)  
Brian Patrick Murphy, Esquire (Via AIS E-Mail)  
Bruce Wyche Bannister, Esquire (Via AIS E-Mail)  
Luke Anthony Burke, Esquire (Via AIS E-Mail)