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Feb 04 2025

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 Plaintiffs, Ronnie Douglas, Eric J. Douglas, Jacqueline Walker, Donna Harding, and Diane Brenda Spears ("Plaintiffs"), 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.

Plaintiffs, Ronnie Douglas, Eric J. Douglas, Jacqueline Walker, Donna Harding, and Diane Brenda Spears are being served with a copy of this Motion via US Mail, Certified, Return Receipt Requested

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 Plaintiffs in the above captioned case and for the Court to provide Plaintiffs sufficient time to find successor counsel.

Respectfully submitted,

LEMPESIS LAW FIRM, LLC

/s Christopher W. Lempesis, Jr.
Christopher W. Lempesis, Jr. (SC Bar # 77012)
73 Sea Island Parkway, Unit 16
Beaufort, SC 29907
843.379.9356
Chris@LempesisLaw.com

Counsel for James H. Moss

February 4, 2025

Beaufort, South Carolina

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SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
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CASE NO.: 2019-CP-07-01995

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

Appellants,

vs.

Kevin Holmes

Respondent

PROOF OF SERVICE

I certify that I, Jessica Pierce, paralegal for LEMPESIS LAW FIRM, LLC have served the Motion to be Relieved as Counsel on Brenda Spears by depositing a copy of it in the United States Mail, postage prepaid, Certified Mail Restricted Delivery, Return Receipt requested on February 4, 2025, 5625 Beatties Ford Rd., Charlotte, North Carolina 28216.

s/ Jessica L. Pierce
Jessica Pierce

February 4, 2025

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Charlotte, NC 28216

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February 4, 2025

Via Certified Mail Return Receipt:

Ms. Jacqueline Walker
558 Broad River Rd.
Beaufort, SC 29906

Ms. Donna Harding
5704 Beatties Ford Rd.
Charlotte, NC 28216

Mr. Eric Douglas
23 Donaldson Camp Rd
Burton, SC 29906

Ms. Brenda Spears
5625 Beatties Ford Rd.
Charolett, NC 28216

Re: Case Number 2019-CP-07-01995

Dear Sir/Madam:

Enclosed for service upon you, please find the attached Motion to be Relieved as Counsel filed on behalf of Mr. James H. Moss.

With kind regards, I remain

Sincerely,

LEMPESIS LAW FIRM, LLC

Christopher W. Lempesis, Jr.

CWL/jp

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.

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Plaintiffs, Ronnie Douglas, Eric J. Douglas, Jacqueline Walker, Donna Harding, and Diane Brenda Spears are being served with a copy of this Motion via US Mail, Certified, Return Receipt Requested

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 Plaintiffs in the above captioned case and for the Court to provide Plaintiffs sufficient time to find successor counsel.

Respectfully submitted,

LEMPESIS LAW FIRM, LLC

/s Christopher W. Lempesis, Jr.
Christopher W. Lempesis, Jr. (SC Bar # 77012)
73 Sea Island Parkway, Unit 16
Beaufort, SC 29907
843.379.9356
Chris@LempesisLaw.com

Counsel for James H. Moss

February 4, 2025

Beaufort, South Carolina

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

Appellants,

vs.

Kevin Holmes

Respondent

PROOF OF SERVICE

I certify that I, Jessica Pierce, paralegal for LEMPESIS LAW FIRM, LLC have served the Motion to be Relieved as Counsel on Donna Harding by depositing a copy of it in the United States Mail, postage prepaid, Certified Mail Restricted Delivery, Return Receipt requested on February 4, 2025, 5704 Beatties Ford Rd., Charlotte, North Carolina 28216.

s/ Jessica L. Pierce
Jessica Pierce

February 4, 2025

9589 0710 5270 2440 4189 92

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<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
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<input type="checkbox"/> Adult Signature Required	\$0.00
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Postage \$0.73

Total Postage and Fees

\$9.68

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Donna Harding
Street and Apt. No., or PO Box No.
5704 Beatties Ford Rd
City, State, ZIP+4®
Charlotte, NC 28216

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions





February 4, 2025

Via Certified Mail Return Receipt:

Ms. Jacqueline Walker
558 Broad River Rd.
Beaufort, SC 29906

Ms. Donna Harding
5704 Beatties Ford Rd.
Charlotte, NC 28216

Mr. Eric Douglas
23 Donaldson Camp Rd
Burton, SC 29906

Ms. Brenda Spears
5625 Beatties Ford Rd.
Charolett, NC 28216

Re: Case Number 2019-CP-07-01995

Dear Sir/Madam:

Enclosed for service upon you, please find the attached Motion to be Relieved as Counsel filed on behalf of Mr. James H. Moss.

With kind regards, I remain

Sincerely,

LEMPESIS LAW FIRM, LLC

Christopher W. Lempesis, Jr.

CWL/jp

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

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Jacqueline Walker,
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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. Lempeis, Jr., Esq. on behalf of James H. Moss, an attorney of record for Plaintiffs, Ronnie Douglas, Eric J. Douglas, Jacqueline Walker, Donna Harding, and Diane Brenda Spears ("Plaintiffs"), 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.

Plaintiffs, Ronnie Douglas, Eric J. Douglas, Jacqueline Walker, Donna Harding, and Diane Brenda Spears are being served with a copy of this Motion via US Mail, Certified, Return Receipt Requested

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 Plaintiffs in the above captioned case and for the Court to provide Plaintiffs sufficient time to find successor counsel.

Respectfully submitted,

LEMPESIS LAW FIRM, LLC

/s Christopher W. Lempesis, Jr.
Christopher W. Lempesis, Jr. (SC Bar # 77012)
73 Sea Island Parkway, Unit 16
Beaufort, SC 29907
843.379.9356
Chris@LempesisLaw.com

Counsel for James H. Moss

February 4, 2025

Beaufort, South Carolina

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Jacqueline Walker,
Donna Harding, and
Diane Brenda Spears,

Appellants,

vs.

Kevin Holmes

Respondent

PROOF OF SERVICE

I certify that I, Jessica Pierce, paralegal for LEMPESIS LAW FIRM, LLC have served the Motion to be Relieved as Counsel on Eric Douglas by depositing a copy of it in the United States Mail, postage prepaid, Certified Mail Restricted Delivery, Return Receipt requested on February 4, 2025, 23 Donaldson Camp Road, Burton, South Carolina 29906.

s/ Jessica L. Pierce
Jessica Pierce

February 4, 2025

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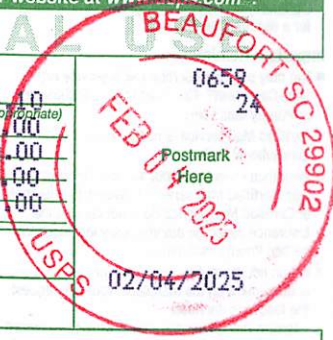
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Beaufort, SC 29906

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February 4, 2025

Via Certified Mail Return Receipt:

Ms. Jacqueline Walker
558 Broad River Rd.
Beaufort, SC 29906

Ms. Donna Harding
5704 Beatties Ford Rd.
Charlotte, NC 28216

Mr. Eric Douglas
23 Donaldson Camp Rd
Burton, SC 29906

Ms. Brenda Spears
5625 Beatties Ford Rd.
Charolett, NC 28216

Re: Case Number 2019-CP-07-01995

Dear Sir/Madam:

Enclosed for service upon you, please find the attached Motion to be Relieved as Counsel filed on behalf of Mr. James H. Moss.

With kind regards, I remain

Sincerely,

LEMPESIS LAW FIRM, LLC

Christopher W. Lempesis, Jr.

CWL/jp

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE BEAUFORT COUNTY
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Plaintiffs, Ronnie Douglas, Eric J. Douglas, Jacqueline Walker, Donna Harding, and Diane Brenda Spears are being served with a copy of this Motion via US Mail, Certified, Return Receipt Requested

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 Plaintiffs in the above captioned case and for the Court to provide Plaintiffs sufficient time to find successor counsel.

Respectfully submitted,

LEMPESIS LAW FIRM, LLC

/s Christopher W. Lempesis, Jr.
Christopher W. Lempesis, Jr. (SC Bar # 77012)
73 Sea Island Parkway, Unit 16
Beaufort, SC 29907
843.379.9356
Chris@LempesisLaw.com

Counsel for James H. Moss

February 4, 2025

Beaufort, South Carolina

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SC Court of Appeals

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APPEAL FROM THE BEAUFORT COUNTY
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Ronnie Douglas,
Eric J. Douglas,
Jacqueline Walker,
Donna Harding, and
Diane Brenda Spears,

Appellants,

vs.

Kevin Holmes

Respondent

PROOF OF SERVICE

I certify that I, Jessica Pierce, paralegal for LEMPESIS LAW FIRM, LLC have served the Motion to be Relieved as Counsel on Jacob Hughes, Esq. by depositing a copy of it in the United States Mail, postage prepaid, and e-mail on February 4, 2025 to the below address:

Mr. Jacob Hughes, Esq.
George Sink, PA Injury Lawyers
P.O. Box 5266
Greenville, SC 29606
jhughes@sinklaw.com

s/ Jessica L. Pierce
Jessica Pierce

February 4, 2025

From: [Jessica Pierce](#)
To: "jhughes@sinklaw.com"
Subject: Case No. 2019-CP-07-01995
Date: Tuesday, February 4, 2025 4:44:33 PM
Attachments: [2025-02-04 CWL LT Hughes - Motion to be Relieved.pdf](#)

Good Afternoon Mr. Hughes,

Please find the attached for Service, the Motion to be Relieved as Counsel filed on behalf of Mr. James H. Moss.

Jessica Pierce
Paralegal with Christopher W. Lempesis, Jr.
LEMPESIS LAW FIRM, LLC.
73 Sea Island Parkway, Unit 16
Beaufort, SC 29907
Phone: 843-379-9356
Fax: 843-970-2444
Office Hours: Monday – Thursday 9am – 5pm
Friday – 10am – 2pm
www.lempesislaw.com

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February 4, 2025

VIA U.S. Mail and E-Mail:

Mr. Jacob Hughes, Esq.
George Sink, PA Injury Lawyers
P.O. Box 5266
Greenville, SC 29606
jhughes@sinklaw.com

Ref: Case No. 2019-CP-07-01995

Dear Mr. Hughes:

Enclosed for service upon you, please find the attached Motion to be Relieved as Counsel filed on behalf of James H. Moss.

With kind regards, I remain

Sincerely,

LEMPESIS LAW FIRM, LLC

A handwritten signature in blue ink, appearing to read 'Christopher W. Lempesis, Jr.'.

Christopher W. Lempesis, Jr.

CWL/jp
Enclosures

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 Plaintiffs, Ronnie Douglas, Eric J. Douglas, Jacqueline Walker, Donna Harding, and Diane Brenda Spears ("Plaintiffs"), 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.

Plaintiffs, Ronnie Douglas, Eric J. Douglas, Jacqueline Walker, Donna Harding, and Diane Brenda Spears are being served with a copy of this Motion via US Mail, Certified, Return Receipt Requested

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 Plaintiffs in the above captioned case and for the Court to provide Plaintiffs sufficient time to find successor counsel.

Respectfully submitted,

LEMPESIS LAW FIRM, LLC

/s Christopher W. Lempesis, Jr.
Christopher W. Lempesis, Jr. (SC Bar # 77012)
73 Sea Island Parkway, Unit 16
Beaufort, SC 29907
843.379.9356
Chris@LempesisLaw.com

Counsel for James H. Moss

February 4, 2025

Beaufort, South Carolina

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Feb 04 2025

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
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APPEAL FROM THE BEAUFORT COUNTY
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HONORABLE R. FERRELL COTHRAN, JR.

CASE NO.: 2019-CP-07-01995

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

Appellants,

vs.

Kevin Holmes

Respondent

PROOF OF SERVICE

I certify that I, Jessica Pierce, paralegal for LEMPESIS LAW FIRM, LLC have served the Motion to be Relieved as Counsel on Jacqueline Walker by depositing a copy of it in the United States Mail, postage prepaid, Certified Mail Restricted Delivery, Return Receipt requested on February 4, 2025, 558 Broad River Rd., Beaufort, South Carolina 29906.

s/ Jessica L. Pierce
Jessica Pierce

February 4, 2025

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<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$0.73
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Total Postage and Fees	\$9.68
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 City, State, ZIP+4® Beaufort, SC 29906



February 4, 2025

Via Certified Mail Return Receipt:

Ms. Jacqueline Walker
558 Broad River Rd.
Beaufort, SC 29906

Ms. Donna Harding
5704 Beatties Ford Rd.
Charlotte, NC 28216

Mr. Eric Douglas
23 Donaldson Camp Rd
Burton, SC 29906

Ms. Brenda Spears
5625 Beatties Ford Rd.
Charolett, NC 28216

Re: Case Number 2019-CP-07-01995

Dear Sir/Madam:

Enclosed for service upon you, please find the attached Motion to be Relieved as Counsel filed on behalf of Mr. James H. Moss.

With kind regards, I remain

Sincerely,

LEMPESIS LAW FIRM, LLC

Christopher W. Lempesis, Jr.

CWL/jp

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE BEAUFORT COUNTY
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HONORABLE R. FERRELL COTHRAN, JR.

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Diane Brenda Spears,

Appellants,

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Kevin Holmes

Respondent.

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Plaintiffs, Ronnie Douglas, Eric J. Douglas, Jacqueline Walker, Donna Harding, and Diane Brenda Spears are being served with a copy of this Motion via US Mail, Certified, Return Receipt Requested

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

Respectfully submitted,

LEMPESIS LAW FIRM, LLC

/s Christopher W. Lempesis, Jr.
Christopher W. Lempesis, Jr. (SC Bar # 77012)
73 Sea Island Parkway, Unit 16
Beaufort, SC 29907
843.379.9356
Chris@LempesisLaw.com

Counsel for James H. Moss

February 4, 2025

Beaufort, South Carolina

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Appellants,

vs.

Kevin Holmes

Respondent

PROOF OF SERVICE

I certify that I, Jessica Pierce, paralegal for LEMPESIS LAW FIRM, LLC have served the Motion to be Relieved as Counsel on Laura Gregg, Esq. by depositing a copy of it in the United States Mail, postage prepaid, and e-mail on February 4, 2025 to the below address:

Ms. Laura Gregg, Esq.
Gregg Law Firm, LLC
P.O. Box 601
Port Royal, SC 29935
lgregg@greggsclaw.com

s/ Jessica L. Pierce
Jessica Pierce

February 4, 2025

From: [Jessica Pierce](#)
To: lgregg@gregglawsc.com
Subject: Case No. 2019-CP-07-01995
Date: Tuesday, February 4, 2025 4:42:34 PM
Attachments: [2025-02-04 CWL LT Gregg - Motion to be Relieved.pdf](#)

Good Afternoon Ms. Gregg,

Please find the attached for Service, the Motion to be Relieved as Counsel filed on behalf of Mr. James H. Moss.

Jessica Pierce
Paralegal with Christopher W. Lempesis, Jr.
LEMPESIS LAW FIRM, LLC.
73 Sea Island Parkway, Unit 16
Beaufort, SC 29907
Phone: 843-379-9356
Fax: 843-970-2444
Office Hours: Monday – Thursday 9am – 5pm
Friday – 10am – 2pm
www.lempesislaw.com

The Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521, applies to e-mail, prohibits unauthorized interception, unauthorized use, and unauthorized disclosure of an e-mail, of the contents of an e-mail, and of any attachments to the e-mail. 18 U.S.C. §§ 2510-2521, the Electronic Communications Privacy Act, provides for civil remedies, including an award of damages, in cases of unauthorized interception, unauthorized use, or unauthorized disclosure of an e-mail, of the contents of an e-mail, or of any attachments to the e-mail.



February 4, 2025

VIA U.S. Mail and E-Mail:

Ms. Laura Gregg, Esq.
Gregg Law Firm, LLC
P.O. Box 601
Port Royal, SC 29935
lgregg@gregglawsc.com

Ref: Case No. 2019-CP-07-01995

Dear Ms. Gregg:

Enclosed for service upon you, please find the attached Motion to be Relieved as Counsel filed on behalf of James H. Moss.

With kind regards, I remain

Sincerely,

LEMPESIS LAW FIRM, LLC

A handwritten signature in blue ink, appearing to read 'Christopher W. Lempesis, Jr.', is written over the printed name.

Christopher W. Lempesis, Jr.

CWL/jp
Enclosures

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. Lempeis, Jr., Esq. on behalf of James H. Moss, an attorney of record for Plaintiffs, Ronnie Douglas, Eric J. Douglas, Jacqueline Walker, Donna Harding, and Diane Brenda Spears ("Plaintiffs"), 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.

Plaintiffs, Ronnie Douglas, Eric J. Douglas, Jacqueline Walker, Donna Harding, and Diane Brenda Spears are being served with a copy of this Motion via US Mail, Certified, Return Receipt Requested

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 Plaintiffs in the above captioned case and for the Court to provide Plaintiffs sufficient time to find successor counsel.

Respectfully submitted,

LEMPESIS LAW FIRM, LLC

/s Christopher W. Lempesis, Jr.
Christopher W. Lempesis, Jr. (SC Bar # 77012)
73 Sea Island Parkway, Unit 16
Beaufort, SC 29907
843.379.9356
Chris@LempesisLaw.com

Counsel for James H. Moss

February 4, 2025

Beaufort, South Carolina

RECEIVED

Feb 04 2025

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE BEAUFORT COUNTY
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HONORABLE R. FERRELL COTHRAN, JR.

CASE NO.: 2019-CP-07-01995

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Diane Brenda Spears,

Appellants,

vs.

Kevin Holmes

Respondent

PROOF OF SERVICE

I certify that I, Jessica Pierce, paralegal for LEMPESIS LAW FIRM, LLC have served the Motion to be Relieved as Counsel on Samuel Svalina, Esq. by depositing a copy of it in the United States Mail, postage prepaid, and e-mail on February 4, 2025 to the below address:

Mr. Samuel Svalina, Esq.
Svalina Law Firm, P.A.
Post Office Drawer 507
Beaufort, SC 29901
sammy@svalinalawfirm.com

s/ Jessica L. Pierce
Jessica Pierce

February 4, 2025

From: [Jessica Pierce](#)
To: sammy@svalinalawfirm.com
Subject: Case No. 2019-CP-07-01995
Date: Tuesday, February 4, 2025 4:43:57 PM
Attachments: [2025-02-04 CWL LT Svalina - Motion to be Relieved.pdf](#)

Good Afternoon Mr. Svalina,

Please find the attached for Service, the Motion to be Relieved as Counsel filed on behalf of Mr. James H. Moss.

Jessica Pierce
Paralegal with Christopher W. Lempesis, Jr.
LEMPESIS LAW FIRM, LLC.
73 Sea Island Parkway, Unit 16
Beaufort, SC 29907
Phone: 843-379-9356
Fax: 843-970-2444
Office Hours: Monday – Thursday 9am – 5pm
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February 4, 2025

VIA U.S. Mail and E-Mail:

Mr. Samuel S. Svalina, Esq.
Svalina Law Firm, PA
Post Office Drawer 507
Beaufort, SC 29901
sammy@svalinalawfirm.com

Ref: Case No. 2019-CP-07-01995

Dear Mr. Svalina:

Enclosed for service upon you, please find the attached Motion to be Relieved as Counsel filed on behalf of James H. Moss.

With kind regards, I remain

Sincerely,

LEMPESIS LAW FIRM, LLC

Christopher W. Lempesis, Jr.

CWL/jp
Enclosures

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IN THE COURT OF APPEALS

APPEAL FROM THE BEAUFORT COUNTY
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Appellants,

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Kevin Holmes

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MOTION TO BE RELIEVED AS COUNSEL

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Respectfully submitted,

LEMPESIS LAW FIRM, LLC

/s Christopher W. Lempesis, Jr.
Christopher W. Lempesis, Jr. (SC Bar # 77012)
73 Sea Island Parkway, Unit 16
Beaufort, SC 29907
843.379.9356
Chris@LempesisLaw.com

Counsel for James H. Moss

February 4, 2025

Beaufort, South Carolina