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Feb 26 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

Mikell R. Scarborough, Master-In-Equity

Appellate Case No. 2022-001165

Michael D. Royal,

Appellant,

v.

Free Kindergarten Association of Charleston,

Respondent,

The Attorney General of the State of South Carolina and
The Charleston County School District,

Intervenors/Respondents.

NOTICE OF PETITION AND PETITION TO WITHDRAW AS COUNSEL

Jeffrey S. Tibbals (S.C. Bar No. 72628)
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Evan P. Williams (S.C. Bar No. 101981)
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880 Johnnie Dodds Blvd., Suite 2
Mt. Pleasant, SC 29464
Telephone: 843.881.1623

Counsel for Appellant Michael D. Royal

TO: THE ABOVE-NAMED RESPONDENT AND INTERVENORS/RESPONDENTS AND THEIR COUNSEL OF RECORD:

YOU WILL PLEASE TAKE NOTICE THAT Jeffrey S. Tibbals and Evan P. Williams (collectively, the “Attorneys”), attorneys with the law firm of Bybee & Tibbals, LLC, with the consent of Appellant Michael D. Royal (“Royal”) and pursuant to Rule 264(b), SCACR, respectfully request that this Court enter an Order granting their petition to withdraw from representation of Royal in this matter. The grounds for this petition are set forth below:

1. The Attorneys are counsel of record for Royal in this matter.
2. Royal has advised the Attorneys that he wishes to terminate his attorney-client relationship with the Attorneys and has asked them to file the instant Petition for withdrawal.
3. Pursuant to Rule 264(b), SCACR, the Attorneys submit this petition to the Court with the consent, and at the request, of their client, with proper written notice to their client, and with notice to the adverse parties, as demonstrated by the Proof of Service of this Petition filed concurrently herewith.

Respectfully submitted,

s/Jeffrey S. Tibbals
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Respectfully submitted,

s/Evan P. Williams
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Counsel for Appellant Michael D. Royal

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Michael D. Royal, Appellant,

v.

Free Kindergarten Association of Charleston, Respondent,

The Attorney General of the State of South Carolina and
The Charleston County School District, Intervenors/Respondents.

PROOF OF SERVICE

I certify that I have served the Notice of Petition and Petition to Withdraw as Counsel on the above-named Respondent and Intervenors/Respondents via email to their respective counsel of record (see attached email), on February 26, 2025, containing the above-referenced document as an attachment in .pdf, sent to the addresses shown below.

Patrick F. Stringer, Esq.
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*Counsel for Respondent Free
Kindergarten Association of Charleston*

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*Court-Appointed Receiver for Respondent Free
Kindergarten Association of Charleston*

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*Counsel for Intervenor/Respondent The Attorney
General of the State of South Carolina*

Respectfully submitted,

s/Evan P. Williams

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Counsel for Appellant Michael D. Royal

From: Evan Williams
Sent: Wednesday, February 26, 2025 10:29 AM
To: pfstringer@yahoo.com; Joe Qualey; Zac Smith; Warren W. Ariail
(warren@ariaillaw.com); Bright Ariail; mfjowers@scag.gov;
ksimons@scag.gov
Cc: Jeff Tibbals; Whitney Moore; Elliott Jones
Subject: 2022-001165 -- Michael D. Royal v. Free Kindergarten Association
Attachments: 2025.02.26_Petition.to.Withdraw.as.Counsel.pdf

Good morning,

Please find attached for service on you, as counsel of record in the above-captioned case, the Notice of Petition and Petition to Withdraw as Counsel for Appellant.

Thank you,

Evan P. Williams

Partner

BYBEE & TIBBALS
EMINENT DOMAIN & PROPERTY
RIGHTS LITIGATION

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