

RECEIVED

Feb 27 2025

S.C. SUPREME COURT

**THE STATE OF SOUTH CAROLINA
In the Supreme Court**

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

R. Lawton McIntosh, Circuit Court Judge

Appellate Case No. 2021-000375

Greg Marcus Simmons and Jermaine Robinson, both individually and derivatively on behalf of Simmons Family Holdings, LLC, a South Carolina Limited Liability Company, Respondents,

v.

Palmer E. Simmons, individually and as Trustee of the Charles E. Simmons Jr. and Rosa G. Simmons Revocable Trust dated May 5, 2016, and Charlesetta S. Aiken, Appellants,

and

Simmons Family Holdings, LLC, as a nominal Defendant.

CONSENT MOTION TO RELIEVE AND SUBSTITUTE COUNSEL

COMES NOW the undersigned attorney, Thomas J. Rode who herein moves this Honorable Court, with the consent of counsel for Appellants, for an Order relieving him from this matter, and substituting attorneys Michael A. Timbes and Sarah D. Baum as additional counsel of record for the Respondents Greg Marcus Simmons and Jermaine Robinson, who shall also continue to be represented by Ehrick K Haight, Jr.(SC Bar No. 2446) and Stacey S. Collins (SC Bar No. 73360).

[signature to follow]

Respectfully submitted,



THURMOND KIRCHNER & TIMBES, P.A.
Thomas J. Rode, SC Bar No. 77480
15 Middle Atlantic Wharf
Charleston, SC 29401
Phone: 843-937-8000
Fax: 843-937-4200
Email: thomas@tktlawyers.com
Attorney for Respondents

s/Michael Timbes
Michael A. Timbes, Bar No. 69730
15 Middle Atlantic Wharf
Charleston, SC 29401
Phone: 843-937-8000
Fax: 843-937-4200
Email: michael@tktlawyers.com

s/Sarah D. Baum
Sarah D. Baum, Bar No. 104544
15 Middle Atlantic Wharf
Charleston, SC 29401
Phone: 843-937-8000
Fax: 843-937-4200
Email: sarah@tktlawyers.com

-and-

MINOR, HAIGHT & ARUNDELL, P.C.
Ehrick K Haight, Jr., SC Bar No. 2446
Stacey S. Collins, SC Bar No. 73360
Post Office Drawer 6067
Hilton Head Island, SC 29938
Phone: 843-785-8040
Additional Counsel for Respondents