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Feb 26 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE DORCHESTER COUNTY
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge

Appellate Case No. 2024-000698

AJP Solutions, LLC

Respondent,

v.

Clark Construction, Inc., of Mississippi,
TCABC Real Estate Holdings, LLC,
and Travelers Casualty and Surety Company
of America, Defendants,

Appellant.

Of which Clark Construction, Inc. of Mississippi
is the Appellant.

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 Appellant(s) for an Order relieving him from this matter, and substituting attorneys Michael A. Timbes and Sarah D. Baum as counsel of record for the Respondent AJP Solutions, Inc. This motion being based upon attorney Rode's departure from the private practice of law.

[signatures to follow]

Respectfully submitted,

THURMOND KIRCHNER & TIMBES, P.A.



s/

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PROOF OF SERVICE

I, hereby certify that the enclosed was served on the parties stated below by emailing a copy of the enclosed document(s) to opposing counsel:

Bryan Kelley, Esq
Elmore Goldsmith Kelley and DeHoll, PA
bkelly@elmoregoldsmith.com

This 26th day of February, 2025.

THURMOND KIRCHNER & TIMBES, P.A.

BY: s/ *Kaitlyn Nobles*
KAITLYN NOBLES