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Apr 10 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM KERSHAW COUNTY
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

Case No. 2019-CP-28-01137
Appellate Case No. 2023-001193

Charles Ives,Appellant,

v.

Charles E. Campbell, Vivian C. Gardner, T. Clayter Campbell,
Thomas Clayter Campbell, and Eddie Harold Goff, Trustees of the
Colbert H. Campbell United Trust, Sonja C. Parker, Barry Campbell,
and Randy Bowers Defendants.

of Whom Charles E. Campbell, Vivian C. Gardner, T. Clayter Campbell,
Thomas Clayter Campbell, and Eddie Harold Goff, Trustees of the
Colbert H. Campbell United Trust, Sonja C. Parker, and Barry Campbell, are
..... Respondents.

**MOTION FOR SUBSTITUTION OF
THOMAS CLAYTOR CAMPBELL, SR.**

Thomas Clayter Campbell, Jr., by and through the undersigned counsel, and pursuant to Rule 265, SCACR, hereby moves to be substituted as a party Respondent for T Clayter Campbell Sr. in this matter. In support of this motion, the movant provides as follows:

- a. Respondent T Clayter Campbell (Full Name “Thomas Clayter Campbell Sr.”) passed away on August 26, 2024.
- b. Thereafter, Thomas Clayter Campbell, Jr. was appointed as the representative and trustee to the estate and trust of Thomas Clayter Campbell Sr.

- c. All parties have been notified and consent to the substitution.
- d. The substitution of Thomas Clayter Campbell Jr., as a Respondent, will not prejudice any party involved in this matter and will allow the case to proceed without delay.

WHEREFORE, the parties respectfully request that this Court GRANT this motion and enter an Order: (1) substituting Thomas Clayter Campbell, Jr., as Personal Representative and Trustee for the Estate and Testamentary Trust of Thomas Clayter Campbell, Sr for Respondent T Clayter Campbell, and (2) amending the caption of this matter as follows:

Charles Ives,Appellant,

v.

Charles E. Campbell, Vivian C. Gardner, T. Clayter Campbell, Thomas Clayter Campbell, and Eddie Harold Goff, Trustees of the Colbert H. Campbell United Trust, Sonja C. Parker, Barry Campbell, and Randy Bowers Defendants.

of Whom Charles E. Campbell, Vivian C. Gardner, Thomas Clayter Campbell, Jr., as Personal Representative and Trustee for the Estate and Testamentary Trust of Thomas Clayter Campbell, Sr, Thomas Clayter Campbell, and Eddie Harold Goff, Trustees of the Colbert H. Campbell United Trust, Sonja C. Parker, and Barry Campbell, are Respondents.

We move and consent:

<i>s/Haley Hubbard</i>	<i>s/J. Paul Porter</i>
Desa Ballard (498)	J. Paul Porter (100723)
Harvey M. Watson III (74053)	Harper L. Hutson (106343)
Haley Hubbard (103195)	Cromer Babb & Porter, LLC
Ballard & Watson	PO Box 11675
226 State Street	Columbia SC 29211
West Columbia, SC 29169	803-799-9530
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Attorneys for Appellant	Attorneys for Respondents

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Columbia, South Carolina

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and Randy Bowers, Defendants,

of Whom Charles E. Campbell, Vivian C. Gardner, T. Clayter Campbell,
Thomas Clayter Campbell, and Eddie Harold Goff, Trustees of the
Colbert H. Campbell United Trust, Sonja C. Parker, Barry Campbell,
are the, Respondents.

PROOF OF SERVICE

I, Gina Blyler, an employee of Cromer Babb & Porter, LLC, do hereby certify that on April 10, 2025,
served a copy of the **Motion for Substitution of Thomas Clayter Campbell, Sr.**, in the above
captioned case on the following individuals by electronic mail using their email address listed in the
Attorney Information System as follows:

Desa Ballard, Esquire
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Gina Blyler
Litigation Paralegal

April 10, 2025
Columbia, South Carolina