

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. 2025-000636

The Vanderham Family Living
Trust, Villa Las Palmas LLC,
Scout Beach House LLC, Amy
Oakes, and Black Ice Venture,
II,

Appellants,

v.

City of Isle of Palms and South
Carolina Department of Environmental
Services,

Respondents.

**COUNSEL FOR APPELLANTS'
MOTION TO WITHDRAW AND
SUBSTITUTION OF COUNSEL**

Pursuant to Rule 263(4), SCACR, Attorney Rachel L. Ferguson, Esquire, hereby moves to withdraw as counsel for Appellants, The Vanderham Family Living Trust, Villa Las Palmas LLC, Scout Beach House LLC, Amy Oakes, and Black Ice Venture, II. The motion is based on the grounds that Appellants' Attorney, Rachel L. Ferguson, Esquire, left Finkel Law Firm and is not be able to take any clients with her due to her new employment (academia). Harry L. Goldberg, Esq., of Finkel Law Firm LLC respectfully requests this court add him as an attorney of record for Appellants. Appellants have been notified of Rachel L. Ferguson's departure from Finkel Law Firm LLC.

Respectfully submitted,

/s/ Rachel Ferguson

Gerry M. Finkel (S.C. Bar #2013)
Harry L. Goldberg (S.C. Bar # 2169)
Rachel Ferguson (S.C. Bar #75224)
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August 24, 2025

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SC Court of Appeals

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The Vanderham Family Living
Trust, Villa Las Palmas LLC,
Scout Beach House LLC, Amy
Oakes, MMH Property Holding
LLC, and Black Ice Venture, II,

Appellants,

v.

City of Isle of Palms and South
Carolina Department of Environmental
Services,

Respondents.

PROOF OF SERVICE

Pursuant to Rule 262, SCACR, and Section (d)(1) of the South Carolina's Supreme Court's April 24, 2024, amended order, I certify that I have served the Motion to Withdraw and Substitution of Counsel in the above-captioned upon all counsel of record by email on August 24, 2025, to the lawyer's primary e-mail address listed in the Attorney Information System (AIS):

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SC Court of Appeals

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August 24, 2025