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Aug 20 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Beaufort County
Court of Common Pleas

Marvin H. Dukes, Master-in-Equity

Case No. 2022-CP-07-02454
Appellate Case No.: 2023-000411

Blue Bell Holdings, LLC, Appellant,

v.

Gary C. Johnson, Stephen D. Halpern, Holly A. Angel, Holly Ann, LLC, Belmont Properties, LLC, Shoreline Funding, LLC, and Orange Capital, LLC (Nevis) Respondents.

**PETITION TO BE RELIEVED AS COUNSEL FOR
RESPONDENT GARY C. JOHNSON**

YOU ARE HEREBY GIVEN NOTICE THAT Elizabeth J. Palmer of Saxton & Stump, LLC, for Respondent Gary C. Johnson, hereby petitions this Honorable Court for an Order relieving her and the law firm of Saxton & Stump, LLC as counsel in the above referenced matter. This Petition is being made pursuant to Rule 1.16(b)(5) and (6), RPC, Rule 407, SCACR, and with the consent of Appellant Blue Bell Holdings, LLC. Respondent Gary C. Johnson has been given written notice of the undersigned’s intention to withdraw as counsel and will be served with a copy of this Petition. The other named Respondents are not parties to this appeal and have not appeared.

WHEREFORE, having fully stated the basis for this Petition, the undersigned counsel respectfully requests an Order from the Court which allows her and the law firm of Saxton & Stump, LLC to withdraw as counsel for the above-named Respondent and to allow the Respondent sixty (60) days from the date of such Order to secure new counsel. In the interim, Respondent Gary C. Johnson may be served as follows:

gcj8953@gmail.com

P.O. Box 7841
Hilton Head Island, SC 29938

P.O. Box 13061
North Palm Beach, FL 33408

Respectfully submitted,

/s/ Elizabeth J. Palmer
Elizabeth J. Palmer
Saxton & Stump, LLC
151 Meeting Street, Suite 400
Charleston, SC 29401
ep@saxtonstump.com
(843) 414-5080

ATTORNEY FOR RESPONDENT GARY
C. JOHNSON

August 20, 2025

WE CONSENT:

/s/ J. Ashley Twombly
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ATTORNEYS FOR APPELLANT

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APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Appellate Case No.: 2023-000411

Blue Bell Holdings, LLC Appellants,

vs.

Gary C. Johnson, Stephen D. Halpern, Holly A. Angel, Holly Ann, LLC, Belmont Properties, LLC,
Shoreline Funding, LLC and Orange Capital, LLC (Nevis)..... Respondents.

PROOF OF SERVICE

I do hereby certify that on August 20, 2025, I have served all counsel in this action with a copy of the *Petition to be Relieved as Counsel for Respondent Gary C. Johnson* via email to the following email addresses:

J. Ashley Twombly, Esquire
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Attorneys for Appellant

s/ Taylor Davis

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SC Court of Appeals

Direct Dial: (843) 278-0114
Email: tdavis@saxtonstump.com

August 20, 2025

VIA U.S. MAIL

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Blue Bell Holdings, LLC vs. Gary C. Johnson, et al.
Appellate Case No.: 2023-000411

Dear Ms. Kitchings:

Please find enclosed a check in the amount of \$50.00, to cover the filing fee for the Petition to be Relieved as Counsel for Respondent Gary C. Johnson and Proof of Service in connection with the above referenced matter. Also enclosed is a copy of the motion, which has been e-filed.

Should you have any questions or concerns, please do not hesitate to contact us. Thank you for your assistance with this matter.

Sincerely,

s/ Taylor Davis

Taylor Davis
Paralegal

/tnd

Enclosures

cc (via email only): J. Ashley Twombly, Esquire
Thomas Iandoli, Esquire
Bess DuRant, Esquire