

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM HORRY COUNTY
B. Alex Hyman, Circuit Court Judge

Appellate Case No. 2025-001824

South Carolina Department of Transportation,.....Respondent,
v.

Myra N. Starnes,Appellant.

**MOTION TO BE
RELIEVED AS COUNSEL**

The undersigned counsel of record for Appellant, Myra N. Starnes, hereby moves for an Order permitting their withdrawal as counsel of record for the Appellant. In support of their motion, Counsel would show:

1. The undersigned counsel was retained as counsel for Appellant Myra N. Starnes in the above-captioned matter on January 3, 2024.
2. Circumstances are such that counsel cannot continue to represent Appellant in this matter. They ask the Court to accept their word as officers of the Court that good grounds exist for them to be relieved.
3. Counsel has informed Appellant of their intent to move to be relieved as Appellant's counsel of record.
4. Counsel is informed and believes that their withdrawal as counsel at this time would not prejudice the Appellant in this proceeding or otherwise.

5. Counsel requests that Appellant be given thirty (30) days to notify the Court of new counsel before Appellant is deemed to be pro se.

WHEREFORE, the undersigned prays for an Order permitting their withdrawal as counsel of record for Appellant.

Respectfully submitted,

s/ Desa Ballard
Desa Ballard (S.C. Bar No. 498)
Harvey M. Watson III (S.C. Bar No. 74053)
Haley Hubbard (S.C. Bar No. 103195)

BALLARD & WATSON
226 State Street
West Columbia, South Carolina 29169
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ATTORNEYS FOR APPELLANT

September 12, 2025

RECEIVED

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
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v.

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PROOF OF SERVICE

I, Beth Cogan, an employee with Ballard & Watson, do hereby certify that on September 12, 2025, I served a copy of the **Motion to Be Relieved as Counsel**, in the above-captioned case on the following individuals by electronic mail using their email address listed in the Attorney Information System, addressed as follows:

David Pagliarini, Esquire
PAGLIARINI LAW FIRM, LLC
david@lawplf.com

Julia Anne McKeachie, Esquire
PAGLIARINI LAW FIRM, LLC
juliaanne@lawplf.com

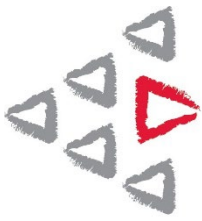
Via U.S. Mail

Myra Starnes
Post Office Box 332
Myrtle Beach, South Carolina 29578



Beth Cogan, Paralegal

September 12, 2025



Ballard & Watson
Attorneys at Law
PERSISTENT. UNWAVERING.

Desa Ballard
Harvey M Watson III
Haley Hubbard

226 State Street West Columbia, SC 29169
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September 12, 2025

Via Email (ctappfilings@sccourts.org)
The Honorable Jenny Abbot Kitchings
Court of Appeals Clerk of Court
Post Office Box 11629
Columbia, South Carolina 29211

Re: *South Carolina Department of Transportation v. Myra N. Starnes*
Case No.: 2025-001824

Dear Ms. Kitchings:

A copy of the transcript for the above-referenced matter was received by our office on September 12, 2025. According to our calculations, the Initial Brief of Appellant and Designation of Matter is therefore due on Monday, October 13, 2025. If I am mistaken as to that deadline date, please inform my office as soon as possible. If you have any questions, please do not hesitate to contact my office.

Enclosed for filing, please find a Motion to Be Relieved as Counsel and Proof of Service for the above-referenced matter. Pursuant to paragraph (3)(c) of the Supreme Court's amended administrative order dated May 6, 2022 ("Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules" originally dated August 25, 2021) a check for the filing fee is being forwarded separately via US mail.

By copy of this letter and as evidenced by the Proof of Service, this filing has been served upon counsel for the Respondent. If you have any questions, please do not hesitate to contact our office. With warm personal regards, I am,

Sincerely yours,

Desa Ballard
desab@desaballard.com

Enclosures

cc: Via Email
David Pagliarini, Esquire
Julia Anne McKeachie, Esquire
Myra Starnes