

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell R. Scarborough, Special Referee

Appellate Case No. 2025-000636

**RECEIVED**

DEC 16 2025

SC Court of Appeals

106714

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 TO WITHDRAW**

Pursuant to Rule 264, SCACR, Attorney Charles A. Krawczyk, Esquire ("Mr. Krawczyk"), 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 Mr. Krawczyk has not been employed with the Finkel Law Firm since September of 2024. On February 14, 2025 a Notice of Transfer Within Firm was filed with the Charleston County Circuit Court a copy of which is attached hereto as Exhibit A. That notice replaced Mr. Krawczyk with other attorneys still employed by the Finkel Law Firm. As such Mr. Krawczyk should not have been named as counsel of record in this matter. The Appellants were notified of the transfer at the time of its filing.

Pursuant to the South Carolina's Supreme Court's April 24, 2024, amended order, section (c), a filing fee of \$50 is being deposited in the U.S. mail, addressed to the Supreme Court of South Carolina, 1231 Gervais Street, Columbia, South Carolina 29201.

Respectfully submitted,



Charles A. Krawczyk (SC Bar #: 16832)

2118 Bayberry Ct.

Columbia SC, 29206

803-261-9809

December 16, 2025

EXHIBIT A

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF CHARLESTON )  
 )  
 The Vanderham Family Living Trust, Villa )  
 Las Palmas LLC, Scout Beach House LLC, )  
 Amy Oakes, MMH Property Holding LLC, )  
 Black Ice Venture II, )  
 )  
 Plaintiffs, )  
 )  
 vs. )  
 )  
 City of Isle of Palms and South )  
 Carolina Department of Health )  
 and Environmental Control, )  
 )  
 Defendants. )  
 \_\_\_\_\_ )

IN THE COURT OF COMMON PLEAS  
IN THE NINTH JUDICIAL CURCUIT

Civil Action No.: 2024-CP-10-01327

**NOTICE OF TRANSFER  
WITHIN FIRM**

**RECEIVED**

**DEC 16 2025**

**SC Court of Appeals**

You will please take notice that the responsibility for the representation of Plaintiffs in the within action has been transferred within the firm of Finkel Law Firm, LLC from Johnny J. Stewart, Jr., Esq. and Charles Krawczyk, Esq. to Gerald M. Finkel, Esq., and Rachel L. Ferguson (Bailey), Esq., and Timothy L. Calderwood, Esq. All future pleadings, motions, notices, correspondence, and other papers herein should be directed to the undersigned.

**FINKEL LAW FIRM**

By: s/ Rachel L. Ferguson (Bailey)  
 Gerald M. Finkel (SC Bar # 2013)  
 Rachel L. Ferguson (Bailey) (SC Bar #75224)  
 Timothy L. Calderwood (SC Bar # 104943)  
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Dated: February 14th, 2025  
North Charleston, South Carolina

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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.

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**PROOF OF SERVICE**

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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 December 15, 2025, to the lawyer's primary e-mail address listed in the Attorney Information System (AIS):

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