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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

G.D. Morgan, Jr., Circuit Court Judge

Appellate Case No. 2024-001012

Case No. 2022-CP-23-056246

Chris Williams,Appellant,

v.

Applya Occupational Strategies, LLC, Felix Mirando,
Tom Baumgarten, and Andrew Garnock, Respondents.

**PETITION FOR WITHDRAWAL OF JOHN F. CONNELL AS COUNSEL FOR
APPELLANT AND NOTICE OF APPEARANCE OF BERNIE ELLIS AS COUNSEL FOR
APPELLANT**

Appellant Chris Williams , by and though their undersigned counsel, hereby petition this Court for the withdrawal of John F. Connell of Burr & Forman, LLP as counsel for the Appellant in this matter. Mr. Connell’s last day with Burr & Forman LLP was Wednesday, January 21, 2026

Pursuant to Rule 264(b), SCACR, Mr. Connell hereby certifies that Appellant has consented to the withdrawal from representation and agrees to have Bernie Ellis, Esq of Burr & Forman, LLP represent it in this appeal. Mr. Connell also hereby certifies that notice of this petition has been provided to the above-named Respondent by and through its counsel of record.

(Signature Page to Follow)

Respectfully submitted:

s/John F. Connell, Jr./w permission by BWE
John F. Connell, Jr., SC Bar #101701

BURR & FORMAN, LLP

s/Bernie W. Ellis
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Consent provided by:

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s/ Paul S. Landis
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Attorney for Tom Baumgarten

Greenville, South Carolina

February 2, 2026

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PROOF OF SERVICE

I, the undersigned employee of the law offices of Burr & Forman, LLP, do hereby certify that on February 2, 2026, I have served all counsel in this action with a copy of the “*Petition for withdrawal of John F. Connell as Counsel for Appellant and Notice of Appearance of Bernie W. Ellis as Counsel for Appellant*” by emailing a copy to each attorney listed below using their primary email address listed in the Attorney Information System pursuant to Rule 262 of the South Carolina Appellate Court Rules and the May 6, 2022 Order of the South Carolina Supreme Court (as amended):

[Addresses and Signature Page to Follow]

Counsel Served: Via E-Mail Only

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February 2, 2026