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Feb 11 2026

SC Court of Appeals

STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

William P. Keesley, Circuit Court Judge

Appellate Case Number: 2026-000031

Alan J. Baumann and Kayla D. Baumann, Respondents,

vs.

Ivan Chernev and Ignatova Petia Chernev, Appellants.

MOTION TO BE RELIEVED AS COUNSEL

YOU WILL PLEASE TAKE NOTICE THAT that James Edward Bradley and Sierra Carini Hartley as counsel for Defendants Ivan Chernev and Ignatova Petia Chernev move to be relieved as counsel in this matter and for Kathleen McDaniel, Esq. to be substituted as counsel for Defendants Ivan Chernev and Ignatova Petia Chernev. This motion relies upon the following grounds. Counsel were hired by Allstate Vehicle and Property Insurance Company to appear and defend on behalf of Ivan Chernev and Ignatova Petia Chernev (Case No. 2023-CP-32-03506). Since being hired, attorneys for Defendants have litigated this matter and brought the matter to trial before the Honorable William P. Keesley, in Lexington County during the week of August 4, 2025. A verdict for the Plaintiffs was filed on August 8, 2025.

Defendants Ivan Chernev and Ignatova Petia Chernev have chosen to appeal the Court's ruling and have filed a Notice of Appeal on January 9, 2026.

Kathleen McDaniel will represent Ivan Chernev and Ignatova Petia Chernev going forward. As a result, Kathleen McDaniel should be listed as the attorney for Defendants Ivan Chernev and Ignatova Petia Chernev, and James Edward Bradley and Sierra Carini Hartley should be removed as counsel for Defendants Ivan Chernev and Ignatova Petia Chernev. James Edward Bradley and Sierra Carini Hartley respectfully request permission of the Court to be relieved as counsel.

Defendants Ivan Chernev and Ignatova Petia Chernev respectfully request that the Clerk's office make appropriate notations regarding notices and that all parties make appropriate notations regarding notice and service in this matter.

I SO MOVE:

MOORE BRADLEY MYERS LAW FIRM, P.A.

By: s/James Edward Bradley
James Edward Bradley, SC Bar # 66130
Sierra Carini Hartley, SC Bar # 103885
1700 Sunset Boulevard (29169)
P.O. Box 5709
West Columbia, SC 29171
(803) 796-9160
ward@mbmlawsc.com
sierra@mbmlawsc.com
Attorneys for Ivan Chernev and Ignatova
Petia Chernev

I CONSENT:

s/ Kathleen McDaniel w/permission
Kathleen McDaniel, Esq. SC Bar #74826
BURNETTE SHUTT & MCDANIEL, PA
PO Box 1929
Columbia, SC 29202
(803) 904-7913
kmcdaniel@burnetteshutt.law
Attorneys for Ivan Chernev and Ignatova Petia Chernev

West Columbia, South Carolina

February 11, 2026

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PROOF OF SERVICE

I, Noelle A. Visconti, an employee of Moore Bradley Myers Law Firm, P.A., certify that I have served the Appellants' Motion to be Relieved as Counsel on the Respondents by transmitting a copy of same on February 11, 2026, by electronic mail addressed as follows and by US Mail and electronic mail as follows:

Kathleen McDaniel, Esq.
BURNETTE SHUTT & MCDANIEL, PA
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Columbia, SC 29202
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200 East Main St.
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Noelle A. Visconti

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S. Jahue Moore†
James Edward Bradley*
Sheila McNair Robinson
Christian G. Spradley
William H. Edwards
S. Jahue Moore, Jr.
William B. Fortino
Ralph Nichols Riley, Jr.
John C. Bradley, Jr.
Lester McGill Bell, Jr.
Sierra Carini Hartley
Emily E. Collins

Melissa K. Moore
Catherine Liscusky Jumper
Brian M. Eckstrom
Joshua S. E. Martin
Madison B. Kelly

February 11, 2026

Retired
J. Mark Taylor*†
C. David Sawyer, Jr.†
Billy C. Coleman (1916-2019)
Stanley L. Myers*† (1976-2023)
Robert D. Hazel† (1936-2024)

VIA E-MAIL: ctappfilings@sccourts.org
and US Mail

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

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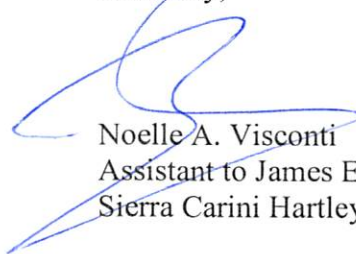
RE: Alan J. Baumann and Kayla D. Baumann, Respondents
v. Ivan Chernev and Ignatova Petia Chernev, Appellants
Appellate Case Number: 2026-000031

Dear Ms. Kitchings:

I hope you are well. Please find enclosed our firm check in the amount of \$50.00 for our Motion to be Relieved as Counsel in this matter.

Please contact our office with any questions or concerns. Thank you for your assistance with this notification.

Sincerely,



Noelle A. Visconti
Assistant to James Edward Bradley and
Sierra Carini Hartley

Enclosures

cc: Kathleen McDaniel, Esq.
Anna W. Yonge, Esq.