

Nelson Mullins

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December 11, 2013

RECEIVED

DEC 11 2013

S.C. Supreme Court

Hand Delivered

The Honorable Daniel E. Shearouse
Clerk of Court
South Carolina Supreme Court
Post Office Box 11330
Columbia, SC 29211


RE: Randy Thomas v. State of South Carolina
Appellate Case No.: 2013-001287
Our file no.: 38769/01510

Dear Mr. Shearouse:

Enclosed please find an original and one copy of Consent Motion for Substitution of Counsel in the above-referenced matter. Please file the original and return a clocked-in copy to me via our courier. Should you have any questions, please do not hesitate to contact me

By copy of this letter, I am hereby serving all interested parties.

Very truly yours,


Matthew A. Abee

MAA:jlee
Enclosures

cc: Megan Harrigan, Esquire
Kristy Grafton Goldberg, Esquire
Randy Thomas

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

DEC 11 2013

G. Thomas Cooper, Circuit Court Judge

S.C. Supreme Court

Case No. 2012-CP-40-01543
Appellate Case No. 2013-001287

Randy Thomas, Petitioner,

v.

State of South Carolina, Respondent.


MOTION TO SUBSTITUTE COUNSEL

Pursuant to Rule 264 of the South Carolina Appellate Court Rules, Petitioner Randy Thomas, SCDC No. 313802 (“Petitioner”), notifies this Court that it desires Matthew A. Abee, Esquire, of the law firm of Nelson Mullins Riley & Scarborough, LLP, to replace Kristy Goldberg, Esquire, and the Law Office of Kristy Goldberg, LLC, as counsel of record for him in this appeal. Petitioner requests that Kristy Goldberg, Esquire, and Law Office of Kristy Goldberg, LLC, be allowed to withdraw as counsel of record. As indicated below, Kristy Goldberg, Esquire, and Law Office of Kristy Goldberg, LLC, consents to this request.

Accordingly, Petitioner, by and through undersigned counsel, requests that this Court order that Matthew A. Abee, Esquire, of the law firm of Nelson Mullins Riley & Scarborough, LLP, be substituted as counsel of record for him in this appeal. Further,

Petitioner requests that Kristy Goldberg, Esquire, and Law Office of Kristy Goldberg, LLC, be relieved of any further representation and be removed from the court dockets in this matter.

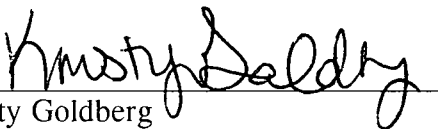
NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 
Matthew A. Abee
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Columbia, South Carolina
December 9, 2013

and

LAW OFFICE OF KRISTY GOLDBERG, LLC

By: 
Kristy Goldberg
E-Mail: Kristy@Kristygoldberglaw.com
1720 Main Street, Suite 301
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Columbia, South Carolina

December 11, 2013

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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S.C. Supreme Court

APPEAL FROM RICHLAND COUNTY
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Case No. 2012-CP-40-01543
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Randy Thomas, Petitioner,
v.
State of South Carolina, Respondent.

Proof of Service

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Randy Thomas, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings:

Motion to Substitute Counsel

Counsel Served:

Assistant Attorney General, Megan Harrigan
Office of the Attorney General
Post Office Box 11549
Columbia, South Carolina 29211

Randy Thomas
Inmate #313802
McCormick Correction
386 Redemption Way
McCormick, SC 29899

Kristy Grafton Goldberg, Esquire
Law Office of Kristy Goldberg, LLC
1720 Main Street, Suite 301
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Jennifer Lee
Administrative Assistant

December 11, 2013