

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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JUL 22 2026

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Administrative Law Court

The Honorable Shirley C. Robinson, Administrative Law Judge

Appellate Case No. 2023-001148

Breyonna S. Jeter Appellant,

v.

South Carolina Department of Motor Vehicles Respondent.

MOTION TO SUBSTITUTE COUNSEL

Pursuant to Rule 264, SCACR, the Respondent South Carolina Department of Motor Vehicles (SCDMV) moves for attorney Christopher Barton to replace prior counsels for the SCDMV in this appeal. Prior counsels of record Brandy Duncan and Curtis Hutchinson resigned their positions at the SCDMV in 2024. Thomas Eller, III, SC Bar # 75802, Assistant General Counsel for the SCDMV resigned from his position in June 2026. Therefore, SCDMV moves for Christopher Barton, General Counsel of SCDMV be substituted as counsel for the SCDMV in this matter. By signature below, Mr. Barton consents to this change being made in this case. Given the nature of this motion, I do not believe consultation with the other party or her Counsel is required by the rules.

s/ Christopher Barton

CHRISTOPHER BARTON, SC Bar # 65261

General Counsel

South Carolina Department of Motor Vehicles

Post Office Box 1498

Blythewood, South Carolina 29016-0020

Telephone: (803) 896-9900

HearingsProcessingUnit@scdmv.net

Counsel for the Respondent

July 17, 2026

Blythewood, South Carolina

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APPEAL FROM RICHLAND COUNTY
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Appellate Case No. 2023-001148

Breyonna Shaquelle Jeter Appellant,

v.

South Carolina Department of Motor Vehicles Respondent.

PROOF OF SERVICE

I HEREBY CERTIFY that I have served Respondent's Motion to Substitute Counsel by depositing a copy of same in the United States Mail, postage prepaid, on July 17, 2026, addressed to the Appellant and the South Carolina Administrative Law Court as follows:

Trent N. Pruett, Esquire
202 North Petty Street
Gaffney, South Carolina 29340

The Honorable Jana Shealy, Clerk
South Carolina Administrative Law Court
Edgar A. Brown Building
1205 Pendleton Street, Suite 224
Columbia, South Carolina 29201

s/ Jeannine Moore
Jeannine Moore
Senior Lit. Paralegal

July 17, 2026
Blythewood, South Carolina

Henry McMaster
Governor



Kevin A. Shwedo
Director

State of South Carolina

Department of Motor Vehicles

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SC Court of Appeals

July 17, 2026

The Honorable Jenny Abbott Kitchings
Clerk, The South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: *Breyonna S. Jeter v. South Carolina Department of Motor Vehicles*
Appellate Case No: 2023-001148

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced action, please find the original and seven (7) copies of Respondent South Carolina Department of Motor Vehicles' Motion to Substitute Counsel. As evidenced by the attached Proof of Service, I am serving the parties with a copy of same. Please file the original and return a copy to me with an affixed clerk's date of filing in the enclosed self-addressed stamped envelope.

Thank you for your cooperation in this matter.

In kind regards,

A handwritten signature in blue ink that reads "Jeannine Moore".

Jeannine (Nina) Moore, Senior Litigation Paralegal
Office of General Counsel

Enclosures

cc: Trent N. Pruett, Esquire
The Honorable Jana Shealy, Clerk of SCALC



MV-17

South Carolina Department of Motor Vehicles

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Blythewood, South Carolina 29016



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