

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Case No. 2011-CP-40-3642

Vernon L. McCullough,

Appellant

v.

South Carolina Dept. of
Corrections, Palmetto Health
d/b/a Palmetto Health
Richland, Jonathon David
Taylor, MD, Poorneema
Ramasamy, MD, William R.
Jennings, MD, William H.
Richardson, MD, and Jennifer
A. Adair, MD.

Respondents.

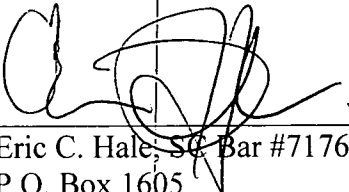
MOTION FOR RELIEF OF COUNSEL

Pursuant to Rule 240, SCACR, Eric C. Hale, Esquire, of Law Office of Eric C. Hale, LLC, 125 Executive Pointe Boulevard, Columbia, SC 29210 hereby enters this Motion for Relief of Counsel. When Movant initially entered the Motion and Notice of Appearance and Extension, it was per agreement with the Appellant's trial attorney, Richard Bolen, and necessary

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for preparation of an appeal requested by Mr. Bolen and Appellant upon short notice. However, the agreement was predicated on certain contractual agreements between Movant, Appellant and Mr. Bolen, namely for cooperation in regards to furnishing costs, monies for work to be done, and provision of documentation concerning the underlying litigation. Such cooperation in regards to furnishing costs, monies for work to be done, and provision of documentation concerning the underlying litigation has not been provided to Movant as of the date of this filing and it is the understanding of Movant, as conveyed to him by Mr. Bolen, that the Appellant has been unwilling and/or unable to cooperate in regards to furnishing costs, monies for work to be done, and/or provision of documentation concerning the underlying litigation. Accordingly, it has now become necessary for the withdrawal of Movant as counsel for Appellant in this appeal.

Further, it is Movant's understanding the Mr. Bolen and his client will be withdrawing the instant appeal by separate filing or by function of court administration of deadlines.



Eric C. Hale, SC Bar #71768
P.O. Box 1605
Irmo, SC 29201
(803) 250-5252

December 27, 2013
Columbia, South Carolina

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Motion for Relief of Counsel upon the parties by placing a copy of same in the United States mail with sufficient postage attached thereto and addressed as follows:

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Elias Fain, Esq.

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