

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM KERSHAW COUNTY
R. Scott Sprouse, Circuit Court Judge
Case No.: 2024-CP-28-00710¹

Professional Insurance Services of Lugoff, LLC,
Drive Safe Driving Academy LLC, and Heather Dykes
as controlling member of both corporate plaintiffs,..... Appellants,
v.

Barry Campbell, Thomas Clayter Campbell, Jr.
as Personal Representative and Trustee for the
Estate and Testamentary Trust of Thomas Clayter Campbell, Sr.,
Francis Campbell, Maxin Campbell, Charles Edward Campbell, Jr.,
James Campbell and Mark Campbell, Vivian Gardner, Sonja Parker,
Mary Dow Jackson, as Personal Representative of the Estate of
Gordon Louis Jackson and John Doe 4, Respondents.

**MOTION TO BE
RELIEVED AS COUNSEL**

The undersigned counsel of record for Appellants, Professional Insurance Services of Lugoff, LLC, Drive Safe Driving Academy LLC, and Heather Dykes as controlling member of both corporate plaintiffs (hereafter “Appellants”), hereby moves for an Order permitting her withdrawal as counsel of record for the Appellant. In support of their motion, Counsel would show:

1. The undersigned counsel was retained as counsel for Appellants in the above-captioned matter on June 10, 2024.
2. Circumstances have arisen that make continued representation of Appellants impractical including a breakdown communications and Counsel believes good grounds exist to be

¹ This Motion to Be Relieved is filed contemporaneously with the Notice of Appeal and undersigned does not yet have the Appellate Case Number.

relieved as counsel pursuant to Rule 1.16 of the Rules of Professional Conduct (Rule 407, SCACR).

3. These circumstances are such that counsel cannot continue to represent Appellants in this matter. Should the Court wish further detail in order to address these issues, Counsel would request an *in camera* inquiry to establish good cause.
4. Counsel has informed Appellants of her intent to move to be relieved as Appellants' counsel of record.
5. Counsel is informed and believes that her withdrawal as counsel at this time would not prejudice the Appellants in this proceeding or otherwise.
6. Counsel requests that time limits for perfecting this appeal be held in abeyance and that Appellants be given sixty (60) days to notify the Court of new counsel before Appellants are deemed to be *pro se*.

WHEREFORE, the undersigned prays for an Order permitting her withdrawal as counsel of record for Appellants.

Respectfully submitted,

s/ Desa Ballard
Desa Ballard (S.C. Bar No. 498)
Law Offices of Desa Ballard
226 State Street
West Columbia, South Carolina 29169
Telephone 803.796.9299
desab@desaballard.com

ATTORNEY FOR APPELLANTS

October 28, 2026

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R. Scott Sprouse, Circuit Court Judge
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As controlling member of both corporate plaintiffs, Appellant,
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Mary Dow Jackson, as Personal Representative of the Estate of
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PROOF OF SERVICE

I, Beth Cogan, an employee with the Law Offices of Desa Ballard, do hereby certify that on October 28, 2026, I served a copy of the **Motion to Be Relieved as Counsel** in the above-captioned case on the following individuals by electronic mail using their email address listed in the Attorney Information System, addressed as follows:

J. Paul Porter, Esquire
Cromer Babb & Porter, LLC
paul@cromerbabb.com

Harper L. Hutson, Esquire
Cromer Babb & Porter, LLC
harper@cromerbabb.com

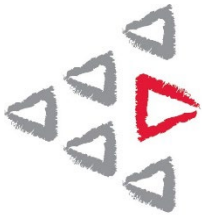
Richard Gleissner, Esquire
Gleissner Law Firm, LLC
rick@gleissnerlaw.com

William Jonathan Harling, Esquire
Harling & West, LLC
jharling@harlingandwest.com



Beth Cogan, Paralegal

October 28, 2026



Law Offices of Desa Ballard

PERSISTENT. UNWAVERING.

Desa Ballard
Haley Hubbard

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October 28, 2026

Via Email (ctappfilings@sccourts.org)
The Honorable Jenny Abbot Kitchings
Court of Appeals Clerk of Court
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED

Oct 28 2026

SC Court of Appeals

Re: *Professional Insurance Services of Lugoff, LLC, et al. v. Barry Campbell, et.al.*
Case No.: 2024-CP-28-00710

Dear Ms. Kitchings:

Enclosed for filing, please find a **Motion to Be Relieved as Counsel** and Proof of Service for the above-referenced matter. Pursuant to paragraph (3)(c) of the Supreme Court's amended administrative order dated May 6, 2022 ("Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules" originally dated August 25, 2021) a check for the filing fee is being forwarded separately via US mail.

By copy of this letter and as evidenced by the Proof of Service, this filing has been served upon counsel for the Respondent. If you have any questions, please do not hesitate to contact our office. With warm personal regards, I am,

Sincerely yours,

desab@desaballard.com

Enclosures

cc: Via Email
J. Paul Porter, Esquire
Harper L. Hutson, Esquire
Richard Gleissner, Esquire
Jonathan Harling, Esquire
Charles Ives