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Oct 29 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM KERSHAW COUNTY
Court of Common Pleas

R. Scott Sprouse, Circuit Court Judge

Case No. 2024-CP-28-00710

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.

RESPONSE TO MOTION

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Attorneys for Respondents

The Campbell Respondents respond to the motion by counsel to withdraw seeking the Court (1) require the entity Appellants to obtain counsel to proceed; and (2) preserve Respondents right to seek Rule 269, SCACR sanctions, later, irrespective of counsel's withdraw.

The Appellants' motion requests that Appellants be given sixty days to retain substitute counsel before being deemed pro se. Two Appellants, Professional Insurance Services of Lugoff, LLC and Drive Safe Driving Academy LLC, are business entities that cannot proceed pro se before this Court. Accordingly, any order permitting withdrawal should require those entities to obtain substitute counsel within a definite period.

Finally, the Campbell Respondents expressly reserve their right to seek sanctions under Rule 269, SCACR, arising from the filing or prosecution of this appeal. Withdrawal should not prejudice any such request concerning conduct undertaken by counsel before her withdrawal.

Therefore, the Campbell Respondents requests the Court impose a definite deadline for the appearance of substitute counsel for the entity Appellants, and preserve the Campbell Respondents' right to pursue sanctions against withdrawing counsel for conduct predating withdrawal.

Respectfully Submitted By:

BY: s/J. Paul Porter
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PROOF OF SERVICE

I, Gina Blyler, an employee of Cromer Babb & Porter, LLC, do hereby certify that on
October 29, 2026, I served a copy of the **Response to Motion**, in the above captioned case on
the following individuals by electronic mail using their email address listed in the Attorney
Information System as follows:

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