

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

7/1/25

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Edward W. Miller, Circuit Court Judge

Case No. 2010-CP-23-1646

Kyle Pertuis, Respondent,

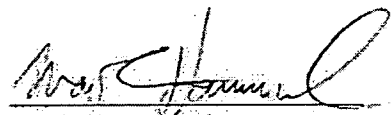
v.


Front Roe Restaurants, Inc., Beachfront
Foods, Inc., Lake Point Restaurants, Inc.,
Mark Hammond and Larkin Hammond, Appellants.

MOTION TO SUBSTITUTE COUNSEL

The appellants respectfully request that the Court issue an order relieving attorney Rodney Pillsbury and substituting attorney John Nichols as their counsel in this case. Attorney Curtis Stodghill will remain as counsel of record in addition to attorney Nichols. See Rule 264, SCACR; see also *Ex parte Strom*, 343 S.C. 257, 539 S.E.2d 699 (2000).

The appellants are being served with a copy of this motion and by their signatures below, they represent to the Court that it is their desire for this motion to be granted.


Mark Hammond
(In his individual and official capacity)


Larkin Hammond
(In his individual and official capacity)

RECEIVED
JAN 30 2014
SC Court of Appeals

January 17, 2014

Respectfully submitted, 1



John S. Nichols, SC Bar # 4210

BLUESTEIN NICHOLS

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Attorney for Appellants

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Kyle Pertuis, Respondent-Appellant,

v.

Front Roe Restaurants, Inc., Beachfront
Foods, Inc., Lake Point Restaurants, Inc.,
Mark Hammond and Larkin Hammond, Appellants-Respondents.

PROOF OF SERVICE

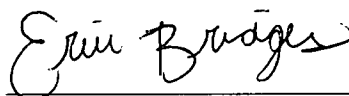
The undersigned hereby certifies that on the date indicated below she served
counsel for the Respondent-Appellant with a copy of the *Motion to Substitute Counsel* by
mailing copies of the same by United States Mail with first class postage prepaid to the
following address:

Robert C. Wilson, Jr., Esquire
201 Whitsett St.
Greenville, SC 29601

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JAN 30 2014

January 30, 2014

 **SC Court of Appeals**
Erin Bridges
BLUESTEIN, NICHOLS, THOMPSON
& DELGADO, LLC



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC
ATTORNEYS AT LAW

Margaret Miles Bluestein
John Shannon Nichols
Stacy Elizabeth Thompson
John Dennis Delgado
Allison Paige Sullivan
Ashley Trout Thompson
Blake Alexander Hewitt
Kenneth Henry Dojaquez
John Clarke Newton

OF COUNSEL
O. Eugene Powell, Jr.

January 30, 2013

VIA HAND DELIVERY

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

RE: Kyle Pertuis v. Front Roe Restaurants, Inc.
Case Tracking No.: 2013-002257

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a *Motion to Substitute Counsel* in reference to this case. I have also enclosed a proof of service of this document on counsel for the Respondents and a \$25.00 check for filing this motion. Please return the additional filed copy to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges
Paralegal to John S. Nichols
BLUESTEIN, NICHOLS, THOMPSON &
DELGADO, LLC

/emb

Enclosures

cc: Curtis W. Stodghill, Esquire
Rodney F. Pillsbury, Esquire
Robert C. Wilson, Jr., Esquire

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