

The State of South Carolina RECEIVED

In the Court of Appeal

MAR 21 2014

The Appellate Case No. 2014-000147 SC Court of Appeals

H. Thad White v. Petrel International

Reply to Motion for Relief

The appellant, Petrel International, LLC, hereby objects the Motion for Relief as Counsel by William J. Tuck.

First of all, the substitution of the counsel of record by William J. Tuck violated the Rules of SC RCP. Without the notice to the defendant and without consent order of the trial court, the appearance of William J. Tuck for the plaintiff was procedurally barred. Therefore, all of the orders as results of the motion hearing of Nov. 21, 2013 should be vacated according to the rules of SC RCP. The Motion To Vacate in the lower court is attached as a reference.

The Secondly, SCACR requires the continue legal representation from lower court. The lower court shall have

the jurisdiction to determine who is considered as the counsel of record for the case. Therefore, the Motion for Relief as counsel should be made in the lower court, not in appellate court.

Therefore, the appellant hereby requests this court to remand the case back to the lower court for a rehearing to correct errors of laws.

March 21, 2014

Hanyan Lin

Petrel International,

P.O. Box 1011

Columbia, SC 29202,

803-404-7163.

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In the Court of Appeal
Case No. 2014-000147
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Certificate of Service.

I, Haiyan Lin, ~~do~~ Certify that I
have served a copy of the Reply to the
Motion for Relief by depositing it in
US mail on March 21, 2014. to

The Braddock Law Firm, LLC
cc. William J. Tuck
2231 W. Palmetto St, #203
Florence, SC 29503.

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