

STATE OF SOUTH CAROLINA
IN THE
SUPREME COURT

Appeal from the Court of Common Pleas
For Georgetown County
Honorable John M. Milling, Circuit Judge
Civil Action No.: 2006-CP-22-0914
South Carolina Court of Appeals
392 S.C. 160, 708 S.E.2d 218 (Ct.App. 2011)

AJG Holdings, LLC; Stalvey Holdings, LLC;
David Croyle; Linda Croyle; Jean C. Abbott;
Linda T. Courtney; Sumter L. Langston; Diane
Langston; Carl B. Singleton, Jr.; Virginia M.
Owens, and Stoney Harrelson,

Respondents,

v.

Levon Dunn; Pamela S. Dunn; and
Helen Sasser,

Petitioners.

MOTION FOR SUBSTITUTION OF PARTY

Stephen P. Groves, Sr., Esquire
NEXSEN PRUET, LLC
205 King Street, Suite 400
Charleston, South Carolina 29401
Telephone: 843.577.9440
Telecopier: 843.720.1777

Attorneys for the Petitioners,
Levon Dunn, Pamela S. Dunn,
and Helen Sasser

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S.C. SUPREME COURT

TO: THE HONORABLE JUSTICES OF THE SOUTH CAROLINA SUPREME COURT:

COMES NOW the Petitioners, Levon Dunn, Pamela S. Dunn, and Robin H. Sasser and Charles E. Sasser as Personal representative of the Estate of Helen Sasser, pursuant to Rules 240 and 265(b) of the South Carolina Appellate Court Rules, and respectfully requests this Supreme Court to permit the party substitution of Robin H. Sasser and Charles E. Sasser as Personal representative of the Estate of Helen Sasser for the Petitioner, Helen Sasser ("Mrs. Sasser"), in this matter.

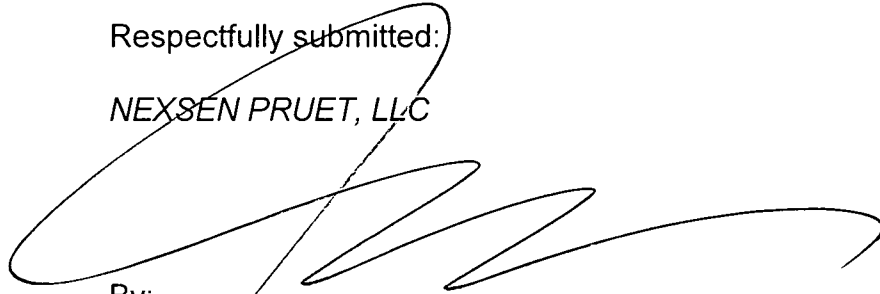
The basis for this motion is that Mrs. Sasser passed away on 13 January 2014, just before this Supreme Court granted certiorari herein, and her Estate will need to be substituted as the proper party-Petitioner. (*A copy of Mrs. Sasser's on-line obituary is attached hereto as Exhibit A and incorporated herein by reference.*). The duly appointed Personal Representatives, Robin H. Sasser and Charles E. Sasser, have collectively agreed to participate in this appeal and have consented to representation by the undersigned. (*A copy of their written consent is attached hereto as exhibit "B" and incorporated herein by reference.*).

The undersigned has discussed this motion with Jack M. Scoville, Jr., Esquire, counsel for the Respondents, AJG Holdings, LLC; Stalvey Holdings, LLC; David Croyle; Linda Croyle; Jean C. Abbott; Linda T. Courtney; Sumter L. Langston; Diane Langston; Carl B. Singleton, Jr.; Virginia M. Owens; and Stoney Harrelson, and he has indicated that he does not have any objection to the motion and understands that it is necessary.

Finally, the Petitioners' respectfully request this Supreme Court to hold the briefing time in abeyance until such time as this motion may be considered and ruled upon.

Respectfully submitted:

NEXSEN PRUET, LLC



By: _____

Stephen P. Groves, Sr., Esquire
205 King Street, Suite 400
Charleston, South Carolina 29401
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*Attorneys for the Petitioners,
Levon Dunn, Pamela S. Dunn,
and Helen Sasser*

Charleston, South Carolina

8 May 2014

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EKH "A"



Helen Sasser

April 7, 1935 - January 13, 2014

Conway...Helen Paisley Sasser, age 78, of Sasser Lane, passed away Monday, January 13, 2014 with her family by her side.

Helen was born April 7, 1935 in Conway, a daughter of the late Charles Ernest and Evelyn Marsh Sasser. Helen loved spending time with her family, and her cat named 'Baby'. If she wasn't hunting, travelling, antiquing, or instigating a practical joke, you could find her at a political meeting. Although a true Democrat, her friendships crossed party lines to help someone or a worthy cause. She loved assisting people in the rural communities. In lieu of flowers, please send a contribution to the Shepherd's Table in Conway, S.C.

Surviving are one daughter, Robin Helen Sasser of Conway, one son, Charles E. Sasser (Malinda) of Conway and six grandchildren, Hunter Sasser, Marsh Sasser, Priscilla Sasser, Lesley Ann O'Neal, Anne Marie La Salle and Ryan La Salle.

Funeral services will be held at 1:00 PM Thursday at Union United Methodist Church with Rev. Scott Johnson and Rev. Joe Young officiating. Burial will follow in Lakeside.

Cemetery directed by Goldfinch Funeral Home, Conway Chapel.

The family will receive friends from 5:00 PM until 7:00 PM Wednesday at the funeral home. Memorials may be made to The Shepherds Table, 1412A Gamecock Avenue Conway, SC 29526.

Sign a guestbook at www.goldfinchfuneralhome.com

Goldfinch Funeral Home, Conway Chapel is in charge of arrangements.

HOWELL V. BELLAMY, JR.
EDWARD B. BOWERS, JR.*
BRADLEY D. KING
M. EDWIN HINDS, JR.
DAVID B. MILLER**
C. WINFIELD JOHNSON, III
DOUGLAS M. ZAYICEK
MARTIN C. DAWSEY*
ROBERT S. SHELTON**
HOWELL V. BELLAMY, III

* LLM TAXATION
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*** LICENSED IN SC & NC
**** LICENSED IN NC ONLY



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EVH. B

ASHLEY P. MORRISON
GEORGE W. REDMAN, III ***
BENJAMIN A. BAROODY ***
PHILLIP H. ALBERGOTTI* ***
HAYES K. STANTON ** ***
KIERSTEN M. GORDON ****
LACY R. LEE

RETIRED:
CLAUDE M. EPPS, JR.
JOHN E. COPELAND
DAVID R. GRAVELY
JILL F. GRIFFITH
JOHN K. RUTENBERG (1939-2012)

April 21, 2014

Mr. Stephen P. Groves, Sr., Esq.
Nexsen Pruet, LLC
205 King St., Suite 400
Charleston, SC 29402

Dear Stephen:

We have met with Charles and Robin Sasser, the personal representatives of the estate of Helen Sasser regarding the lawsuit against Levon and Pamela Dunn and Mrs. Sasser, case no. 2006-CP-22-0914. The Sassers consent to your continued representation in this matter. Please contact us if you have any questions.

Sincerely,

**BELLAMY, RUTENBERG, COPELAND,
EPPS, GRAVELY, & BOWERS, P.A.**

Edward B. Bowers, Jr.
David B. Miller
Lacy R. Lee

WE CONSENT:

Robin H. Sasser

Charles E. Sasser

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PROOF OF SERVICE
for the
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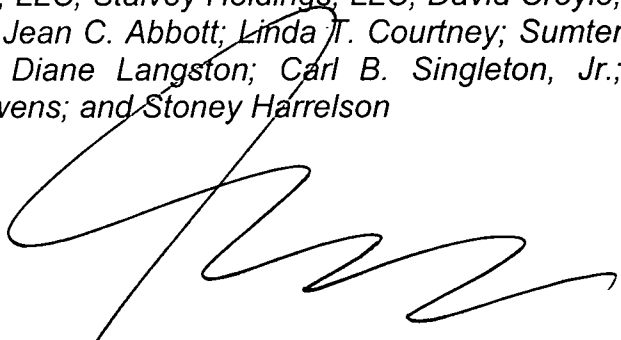
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*Attorneys for the Petitioners,
Levon Dunn, Pamela S. Dunn,
and Helen Sasser*

I, Stephen P. Groves, Sr., Esquire, hereby certify that on 8 May 2014, I served one copy of the *Motion for Substitution of Party* submitted by the Petitioners, Levon Dunn, Pamela S. Dunn, and Helen Sasser, on counsel for the Respondents via the United States Mail, postage pre-paid, and addressed as follows:

Jack M. Scoville, Jr., Esquire
1001 Front Street
Georgetown, South Carolina 29442

*Attorney for the Respondents,
AJG Holdings, LLC; Stalvey Holdings, LLC; David Croyle;
Linda Croyle; Jean C. Abbott; Linda T. Courtney; Sumter
L. Langston; Diane Langston; Carl B. Singleton, Jr.;
Virginia M. Owens; and Stoney Harrelson*



Stephen P. Groves, Sr., Esquire

Charleston, South Carolina
8 May 2014

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