

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**

SEP 05 2014

APPEAL FROM RICHLAND COUNTY  
COURT OF COMMON PLEAS

**SC Court of Appeals**

The Honorable G. Thomas Cooper  
The Honorable J. Ernest Kinard

73443

Case No. 2011-CP-40-6705

JOSEPH S. AZAR, FRANK J. CUMBERLAND, JR., AND  
MICHAEL A. LETTS, INDIVIDUALLY AND  
AS CLASS REPRESENTATIVES,.....APPELLANTS,

V.

CITY OF COLUMBIA, .....RESPONDENT.

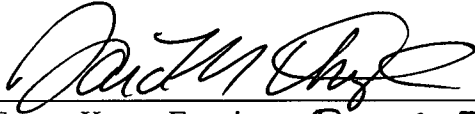
**RESPONDENT'S CONSENT MOTION TO WITHDRAW AND SUBSTITUTE COUNSEL**

Pursuant to Rules 240 and 264, SCACR, Respondent City of Columbia hereby moves to relieve as counsel of record Thomas E. Lydon, Esquire of McAngus Goudelock & Courie, L.L.C; and Mr. Lydon consents to his withdrawal as attorney of record. M. McMullen Taylor, Esquire, formerly of McAngus Goudelock & Courie, L.L.C., now of Mullen Taylor LLC, continues as counsel of record for the Respondent. Counsel for Appellants have no objection to this motion.

New contact information for Ms. Taylor is as follows:

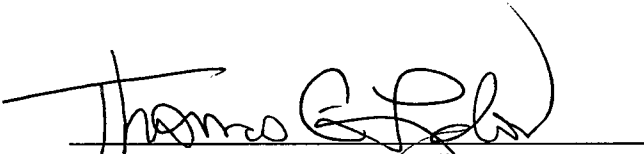
M. McMullen Taylor, SC Bar # 72848  
**Mullen Taylor LLC**  
1230 Richland Street  
Columbia, South Carolina 29201  
Phone: 803-254-1344  
Fax: 803-253-6084  
Electronic mail: [mmt@MullenTaylorLLC.com](mailto:mmt@MullenTaylorLLC.com)

On behalf of Respondent City of Columbia, I consent to the above.



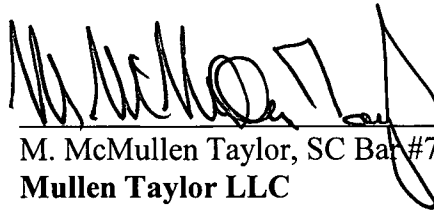
~~Teresa Knox, Esquire~~ *Dana M. Thye, Esq.*  
City Attorney *Asst.*  
City of Columbia  
Post Office Box 667  
Columbia, South Carolina 29202  
(803) 737-4242

I consent to being relieved and substituted.



Thomas E. Lydon, S.C. Bar #10242  
McAngus Goudelock & Courie, LLC  
Post Office Box 12519  
Columbia, South Carolina 29211-2519  
(803) 779-2300

Respectfully submitted,



M. McMullen Taylor, SC Bar #72848  
**Mullen Taylor LLC**  
1230 Richland Street  
Columbia, South Carolina 29201  
(803) 254-1344  
[mmt@MullenTaylorLLC.com](mailto:mmt@MullenTaylorLLC.com)

**Counsel for Respondent City of Columbia**

Sept. 5, 2014

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**PROOF OF SERVICE**

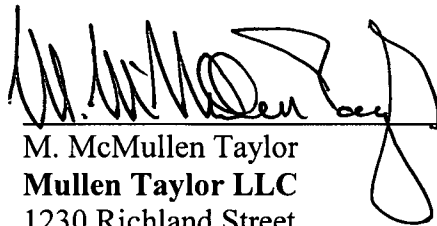
I certify that I have served upon Appellant's counsel Respondent's **Consent Motion to Withdraw and Substitute Counsel** by depositing a copy of it in the United States Mail, postage prepaid, and by electronic mail, on the 5<sup>th</sup> day of September, 2014, addressed to counsel of record, as follows:

C. Dixon Lee, III, Esq. ([dlee@mclarenandlee.com](mailto:dlee@mclarenandlee.com))  
**McLaren & Lee**  
1508 Laurel Street  
Post Office Box 11809  
Columbia, South Carolina 29211

Gene M. Connell, Jr., Esq. ([gconnell@classactlaw.net](mailto:gconnell@classactlaw.net))  
**Kelahr, Connell & Connor, P.C.**  
The Courtyard  
1500 U.S. Highway 17 North, Suite 209  
Surfside Beach, South Carolina 29587

In addition, this Motion has been served upon the withdrawn counsel for the Respondent:

Thomas E. Lydon ([tlydon@mgclaw.com](mailto:tlydon@mgclaw.com))  
**McAngus Goudelock & Courie, LLC**  
Post Office Box 12519  
Columbia, South Carolina 29211-2519

A handwritten signature in black ink, appearing to read "M. McMullen Taylor", is written over a horizontal line. The signature is stylized and cursive.

M. McMullen Taylor  
**Mullen Taylor LLC**  
1230 Richland Street  
Columbia, South Carolina 29201  
(803) 254-1344  
[mmt@MullenTaylorLLC.com](mailto:mmt@MullenTaylorLLC.com)



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Fax 803-253-6084  
mmt@MullenTaylorLLC.com

September 5, 2014

**Via Hand Delivery**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1015 Sumter Street  
Post Office Box 11629  
Columbia, South Carolina 29211

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**SC Court of Appeals**

Re: *Joseph S. Azar, Frank J. Cumberland, Jr., and Michael A. Letts, Individually and as Class Representatives, v. City of Columbia*, Appellate Case No. 2014-000032

Dear Ms. Kitchings:

Please accept for filing the enclosed original and seven copies of Respondent's Consent Motion to Relieve and Substitute Counsel in the above-captioned appeal, along with a certificate of service. Please return one file-stamped copy to my runner. A check for the \$25.00 motion fee is also enclosed. By copy of this letter, opposing counsel and relieved counsel are hereby served.

If you have any questions, please do not hesitate to call.

Very truly yours,

A handwritten signature in black ink, appearing to read "M. McMullen Taylor", with a large, stylized flourish extending to the right.

M. McMullen Taylor

cc: C. Dixon Lee, III, Esq.  
Gene M. Connell, Jr., Esq.  
Thomas E. Lydon, Esq.  
Teresa A. Knox, Esq., City Attorney