



THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2012-CP-10-04969

Appellate Case No. 2013-001273

RECEIVED

OCT 17 2014

SC Court of Appeals

13885

South Carolina Public Interest Foundation and Waring S. Howe, Jr., individually, and on behalf of all others similarly situated, .....Appellants,

vs.

Robert W. Harrell, Jr., in his official capacity as Speaker of the South Carolina House of Representatives, Glenn McConnell, in his official capacity as President of the South Carolina Senate, Representative Harry B. "Chip" Limehouse III, Senator George E. "Chip" Campsen, and the State of South Carolina, ..... Respondents.

**RESPONDENTS' MOTION TO WITHDRAW AND SUBSTITUTE COUNSEL**

Pursuant to Rule 264(b) of the South Carolina Appellate Court Rules, Respondents Speaker Robert W. Harrell, Jr., Glenn McConnell, Representative Harry B. "Chip" Limehouse III, Senator George E. "Chip" Campsen, and the State of South Carolina respectfully come before this Court and file this Motion to Withdraw and Substitute Counsel. The former attorney of record, Mike Hitchcock, has requested to withdraw, and offers his departure from employment with the South Carolina Senate as justifiable cause. Kenneth Moffitt, South Carolina Bar Number 74179, and Edward Bender, South Carolina Bar Number 75110, are currently employed by the Senate and have agreed to be substituted in his place. The substitution is made with the

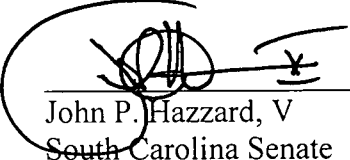
approval of Respondents and the withdrawal is not sought for delay. Notice of this Motion to Withdraw and Substitute Counsel has been provided to opposing counsel by placing a copy in an envelope, postage prepaid, and mailing it via first class mail to their respective addresses of record, this 17 day of October, 2014.

WHEREFORE, Respondents respectfully request that this Court grant its Motion to Withdraw and Substitute Counsel.

[Signature Page to Follow]

Respectfully submitted,

By and through counsel:



John P. Hazzard, V  
South Carolina Senate  
Post Office Box 142  
Columbia, South Carolina 29202  
(803) 212-6300

Attorney for Respondents Glenn  
McConnell, in his official capacity as  
President of the South Carolina Senate,  
and Senator George E. "Chip" Campsen.

Columbia, South Carolina

October 17, 2014

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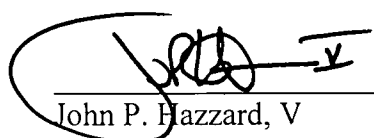
South Carolina Public Interest Foundation and Waring S. Howe, Jr., individually, and on behalf of all others similarly situated, .....Appellants,

vs.

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**PROOF OF SERVICE**

The undersigned attorney hereby certifies that a true copy of Respondents' Motion to Withdraw and Substitute Counsel in the above captioned case has been served upon opposing counsel by placing a copy in an envelope, postage prepaid, and mailing it via first class mail to their respective addresses of record, this 17 day of October, 2014.



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John P. Hazzard, V  
South Carolina Senate  
Post Office Box 142  
Columbia, South Carolina 29202  
(803) 212-6300

Attorney for Respondents

Columbia, South Carolina

October 17, 2014



STATE OF SOUTH CAROLINA  
THE SENATE  
P. O. BOX 142  
GRESSETTE SENATE OFFICE BUILDING  
COLUMBIA. SC 29202

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SC Court of Appeals

October 17, 2014

**Hand Delivered**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1015 Sumter Street, 5th Floor  
Columbia, South Carolina 29201

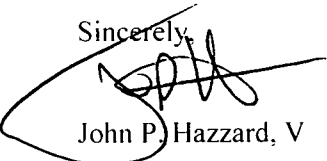
RE: South Carolina Public Interest Foundation, et. al. v. Robert W. Harrell, Jr. in his official capacity as Speaker of the South Carolina House of Representatives, et. al.  
Civil Action No. 2012-CP-40-1589  
Appellate Case No. 2013-001273

Dear Ms. Kitchings:

Enclosed, please find an original and seven copies of a Motion to Withdraw and Substitute Counsel in the above referenced matter. Please file the original and return a clocked-in copy to me. Should you have any questions, please do not hesitate to contact me.

By copy of this letter, I am hereby serving opposing parties.

Sincerely,

  
John P. Hazzard, V

Enclosures

cc: James G. Carpenter  
J. Emory Smith  
Robert E. Tyson, Jr.  
J. Emory Smith

Robert D. Cook  
Robert E. Stepp  
Alexis K. Lindsay