

74091

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

Edgar W. Dickson, *Circuit Court Judge*

**RECEIVED**

NOV 07 2014

**SC Court of Appeals**

Trial Court Case No. 2011-CP-18-1892  
Appellate Case No. 2013-001225

Cynthia D. Bales, Individually and as Personal  
Representative of the Estate of Frank R. Bales,  
on behalf of the Estate and Statutory Beneficiaries.....Appellant,

v.

Buy Right Autos, Inc., and Northbrook Indemnity Co.,  
of whom Northbrook Indemnity Co. is Respondent .....Respondent.

**MOTION TO BE RELIEVED AS COUNSEL OF RECORD**

COMES NOW the undersigned and moves this Honorable Court for an Order relieving him as counsel of record in this case. This motion is based on Rule 240 of the South Carolina Appellate Court Rules. The facts that support this motion are:

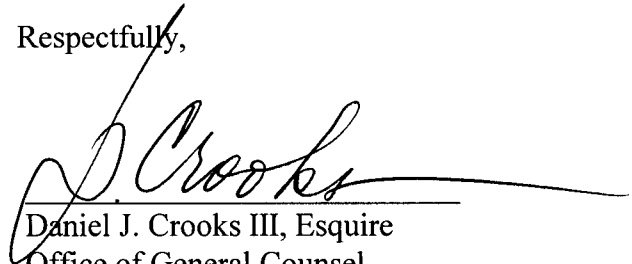
1. The undersigned terminated employment with the Anastopoulo Law Firm, LLC on or around September 30, 2013.
2. The undersigned began employment as a staff attorney in the Office of General Counsel at the South Carolina Department of Corrections on October 17, 2013,

and he continues in that position to this day.

3. Eric Marc Poulin, Esquire, remains on the case as counsel of record for Appellant.

WHEREFORE the undersigned respectfully requests that the Court relieve him as counsel of record in this case.

Respectfully,



Daniel J. Crooks III, Esquire  
Office of General Counsel  
S.C. Department of Corrections  
4444 Broad River Rd.  
Columbia, S.C. 29221  
(803) 896-1355 [direct]

*Columbia, S. C.*

November 5, 2014

Other Counsel of Record:

Eric Marc Poulin, Esquire  
Anastopoulo Law Firm, LLC  
2557 Ashley Phosphate Rd.  
North Charleston, S.C. 29418

*Attorney for Appellant Cynthia Bales*

John Thomas Lay, Esquire  
Gallivan, White & Boyd, P.A.  
P.O. Box 7368  
Columbia, S.C. 29202

*Attorney for Respondent Northbrook*

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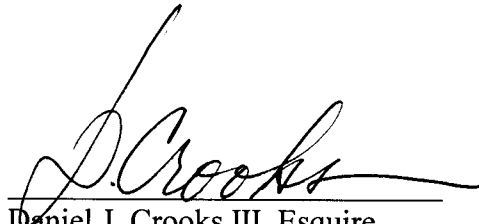
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**CERTIFICATE OF SERVICE**

I, Daniel J. Crooks III, certify that I have served this *Motion to Be Relieved of Counsel of Record* on Appellant’s counsel, Eric Marc Poulin, Esquire, by depositing a copy of it in the United States Mail, postage prepaid, on November 5, 2014, addressed to 2557 Ashley Phosphate Road, North Charleston, South Carolina 29418; and on Respondent’s counsel, John Thomas Lay, Esquire, by depositing a copy of it in the United States Mail, postage prepaid, on November 5, 2014, addressed to Post Office Box 7368, Columbia, South Carolina, 29202.

A handwritten signature in black ink, appearing to read "D. Crooks", written over a horizontal line.

Daniel J. Crooks III, Esquire  
Office of General Counsel  
S.C. Department of Corrections  
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