

ORIGINAL

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

74488

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

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DEC 15 2014

Eugene Griffith, Jr., Circuit Court Judge

SC Court of Appeals

Civil Action No.: 2012-CP-40-7874
Appellate Case No.: 2014-001625

Christopher Carlton as the Personal Representative of the Estate of Helen Tucker Carlton; Christopher Carlton; John Thomas Carlton; and Christopher Carlton as the Personal Representative of the Estate of Kimberly Carlton Baker,..... Respondents,

v.

Greenlawn Funeral Home,..... Appellant.

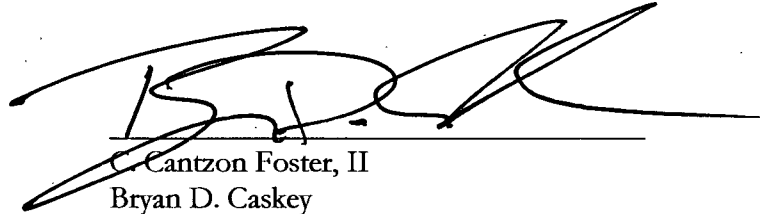
MOTION TO WITHDRAW AS ATTORNEY OF RECORD FOR RESPONDENTS' PURSUANT TO RULE 235(B), SCACR

The undersigned attorneys of record for the Respondents, hereby move for an Order of this Court relieving them as attorneys of record for the Respondents on the ground that there is a breakdown in the attorney/client relationship which prevents the undersigned from effectively representing Respondents any longer. As indicated by the e-mail exchange attached hereto as Exhibit 1, the attorneys for the Appellant consent to this motion.

The Respondents Final Brief is due to be filed and served on or before December 16, 2014. However, pursuant to Rule 224(b), SCACR, this motion shall automatically stay the time limits for perfecting the appeal until this motion is decided.

The undersigned attorneys for the Respondents therefore respectfully moves to be immediately relieved as counsel and for additional time in which to allow the Respondents to obtain new counsel and perfect this appeal.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'B. Caskey', is written over a horizontal line.

C. Cantzon Foster, II

Bryan D. Caskey

FOSTER LAW OFFICE, LLC

3100 Devine Street

Columbia, South Carolina 29205

(803) 400-1921

(803) 400-1951 Facsimile

COUNSEL FOR RESPONDENTS

December 15, 2014
Columbia, South Carolina



Bryan Caskey

From: Drew Butler <DButler@RichardsonPlowden.com>
Sent: Monday, December 15, 2014 3:16 PM
To: Bryan Caskey
Cc: 'cantzon foster'
Subject: RE: Carlton et al. vs. Greenlawn Funeral Home (RE: Withdrawal as Counsel in Appeal)

Thank you, Bryan. You have my consent as counsel for Greenlawn Funeral Home.

Regards,
Drew Butler

HOME	VCARD	BIO	LOCATION
		Drew Hamilton Butler Attorney at Law dbutler@richardsonplowden.com Richardson, Plowden & Robinson, P.A. 1900 Barnwell Street Columbia, SC 29201 AND 40 Calhoun Street, Suite 220 Charleston, SC 29401 Tel: 843-805-6550 Cell: 803-760-6904 www.RichardsonPlowden.com	

The logo for Richardson Plowden Attorneys at Law, featuring the firm name in a stylized font with "ATTORNEYS AT LAW" underneath.

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From: Bryan Caskey [mailto:bryan@fosterlawoffice.net]
Sent: Monday, December 15, 2014 3:14 PM
To: Drew Butler
Cc: 'cantzon foster'
Subject: Carlton et al. vs. Greenlawn Funeral Home (RE: Withdrawal as Counsel in Appeal)

Drew,

This e-mail will follow up on our telephone conversation in which you graciously indicated your consent to our upcoming motion to be relieved as counsel for the Respondents in connection with the *Carlton et al. v. Greenlawn Funeral Home* matter that is on appeal. If you will simply indicate your consent via reply to this e-mail, I will attach it to my motion as evidence of your consent.

Despite being on the adverse side, both Cantzon and I appreciate the professionalism and courtesy you (and your entire office) have displayed throughout this case.

Kindest Regards,

Bryan D. Caskey
Foster Law Office, LLC
3100 Devine Street
Columbia, SC 29205
[\(803\) 400-1921](tel:8034001921)
[\(803\) 400-1951](tel:8034001951) Facsimile

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Eugene Griffith, Jr., Circuit Court Judge

Civil Action No.: 2012-CP-40-7874
Appellate Case No.: 2014-001625

Christopher Carlton as the Personal Representative of the Estate of Helen Tucker Carlton; Christopher Carlton; John Thomas Carlton; and Christopher Carlton as the Personal Representative of the Estate of Kimberly Carlton Baker,.....Respondents,

v.

Greenlawn Funeral Home,.....Appellant.

CERTIFICATE OF SERVICE

I, Bryan D. Caskey, hereby certify that I caused the **Motion to Withdraw as Attorney of Record For Respondents (Pursuant to Rule 235(b), SCACR)** to be served on the persons below by placing the same in the U.S. Mail for delivery, postage-prepaid, first class, on the date set forth below as follows:

Drew Hamilton Butler, Esquire
Caleb Riser, Esquire
Sheila Marlouvon Bias, Esquire
RICHARDSON PLOWDEN & ROBINSON, P.A.

**1900 Barnwell Street
Columbia, SC 29201**

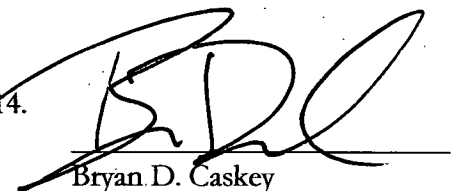
John Thomas Carlton

**964 Glenn Street Extension
Newberry, SC 29108**

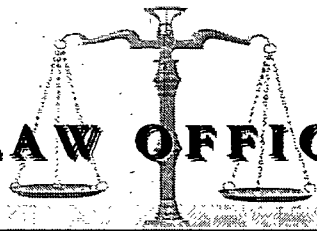
Christopher Carlton, individually, and in his capacity as Personal Representative for the Estate of Helen Tucker Carlton, and in his capacity as Personal Representative for the Estate of Kimberly Carlton Baker

**348 Cherry Blossom Road
Gaston, SC 29053**

Dated at Columbia, South Carolina this 15th day of December, 2014.


Bryan D. Caskey

FOSTER LAW OFFICE, L.L.C.



C. Cantzon Foster, II
Bryan D. Caskey

3100 Devine Street
Columbia, SC 29205
Telephone: (803) 400-1921
Facsimile: (803) 400-1951
www.fosterlawoffice.net

James E. Knight, Jr. *
James S. Guignard *

* Of Counsel

December 15, 2014

VIA HAND-DELIVERY

South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

RECEIVED

DEC 15 2014

SC Court of Appeals

**RE: Christopher Carlton vs. Greenlawn Funeral Home
Appeal from Richland County Circuit Court
Appellate Case No.: 2014-001625**

Dear Madame Clerk:

Please find enclosed an original and six (6) copies of a Motion to Withdraw as Counsel of Record for Respondents (Pursuant to Rule 235(b), SCACR); Certificate of Service; and the associated \$25.00 filing fee in connection with the foregoing matter.

Please have a member of your staff file the original and return the clocked copies to our courier. By copy of this letter, I am serving the same the same upon counsel for the appellant and upon the Respondents.

Thank you for your assistance, and please accept my kindest regards.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bryan D. Caskey', written over a horizontal line.

Bryan D. Caskey

Enclosures (as stated)

cc: Drew Butler, Esquire
Mr. Christopher Carlton
Mr. John Thomas Carlton