

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Allison R. Lee, Circuit Court Judge

Appellate Case No. 2013-001102

Case No. 2011-CP-40-04883R

Raymond Armstrong,

Appellant,

v.

Samuel J. Thompson,

Respondent.

PETITION FOR REHEARING & WITHDRAWAL AS COUNSEL

Appellant, by and through counsel, respectfully petitions the Court pursuant to Rule 221(a), SCACR for rehearing. Appellant respectfully submits that there is an issue of material fact regarding whether Respondent knew or should have known of the hazardous condition that caused Appellant's injuries and summary judgment was premature. Additionally, Appellant respectfully submits that there is a clear factual issue regarding Respondent's negligence in creating the hazard which caused Respondent's injury, summary judgment was inappropriate and the case should be remanded for trial.


RECEIVED
MAR 12 2015
SC Court of Appeals

7532e

Counsel for Appellant hereby further moves to be relieved as counsel due to her inability to locate the Appellant. During the pendency of this action, Appellant resided with his sister at a last known address of 8 Valkyrie Circle, Columbia, SC 29229. Upon information and belief, Appellant's sister deceased in May 2014 and Appellant's remaining family resides in the Buffalo, New York area. Appellant's address and phone number are no longer valid. Appellant has not provided counsel with any updated contact information and most likely no longer lives in the area. Appellant's counsel is unable to communicate with Appellant timely in this matter. Therefore, Appellant's counsel respectfully requests to be dismissed.

WHEREFORE, Appellant respectfully requests that this Petition for Rehearing and to be Relieved as Counsel be granted.

I SO MOVE:



Shannon L. Felder
Solomon Law Group, LLC
1519 Richland Street
Columbia, SC 29201
Attorney for Appellant
(803)391-3120

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Allison R. Lee, Circuit Court Judge

Appellate Case No. 2013-001102

Case No. 2011-CP-40-04883R

Raymond Armstrong,

Appellant,

v.

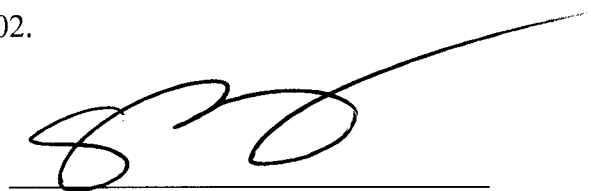
Samuel J. Thompson,

Respondent.

PROOF OF SERVICE

I certify that I have served the Appellant's Petition for Rehearing & Withdrawal as Counsel on Respondent by depositing a copy of it in the United States Mail, postage prepaid, on March 12, 2015, addressed to his attorney of record, Catherine G. Griffin, Baker Ravenel Bender, P.O. Box 8057, Columbia, SC 29202.

March 12, 2015



Shannon L. Felder
Solomon Law Group, LLC
3501 North Main Street
Columbia, SC 29203
Attorney for Appellant
(803)391-3120

RECEIVED
MAR 12 2015
SC Court of Appeals