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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LANCASTER COUNTY
Court of Common Pleas

Benjamin H. Culbertson
Circuit Court Judge

RECEIVED
JUN 26 2015
SC Court of Appeals

Case No. 2012-CP-29-1187

Kenneth R. Gainey.....Appellants

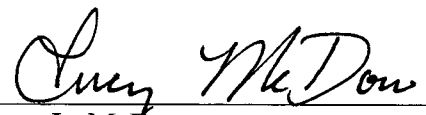
v.

Timothy M. Gainey.....Respondent

MOTION FOR SUBSTITUTION OF COUNSEL

With the consent of the respondent, respondent's trial counsel, and the appellant's attorney,
Lucy L. McDow moves to be substituted as counsel for the respondent for this appeal.

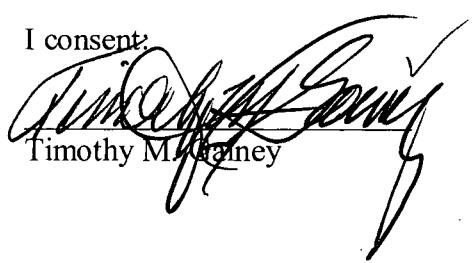
Respectfully submitted,



Lucy L. McDow
P.O. Box 767
Rock Hill, South Carolina 29731-6767
(803) 327-1700
ATTORNEY FOR RESPONDENT

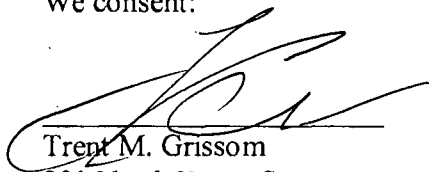
June 17, 2015

I consent:


Timothy M. Gainey

ORIGINAL

We consent:




Trent M. Grissom
201 North Tryon Street
Suite 3000
Charlotte NC 28202-2146
(704) 343-2162
TRIAL ATTORNEY FOR THE RESPONDENT

Philip E. Wright
408 North Main Street
Lancaster SC 29720
(803) 286-4343
ATTORNEY FOR THE APPELLANT

We consent:

Trent M. Grissom
201 North Tryon Street
Suite 3000
Charlotte NC 28202-2146
(704) 343-2162
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Case No. 2012-CP-29-1187


Kenneth R. Gainey.....Appellant

v.

Timothy M. Gainey.....Respondent

PROOF OF SERVICE

I certify that I have served a copy of the Motion for Substitution of Counsel on the appellant, Kenneth R. Gainey, by mailing a copy by United States Mail, postage prepaid, on June 24, 2015, addressed to his attorney of record, addressed as follows: Philip E. Wright, 408 North Main Street, Lancaster SC 29720.



Lucy L. McDow
P.O. Box 767
Rock Hill, South Carolina 29731
(803) 327-1700
Attorney for Respondent

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JUN 26 2015

SC Court of Appeals

Lucy L. McDow
Attorney
P.O. Box 767, 514 Oakland Avenue
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Telephone: (803) 327-1700; Fax: (803) 327-4200
LucyLMcDow@mcdowlaw.com

June 24, 2015

RECEIVED
JUN 26 2015
SC Court of Appeals

The Honorable Jenny Abbott Kitchings
The South Carolina Court of Appeals
P.O. Box 11629
Columbia SC 29211

RE: Kenneth R. Gainey vs. Timothy M. Gainey
Civil Action No. 2012-CP-29-1187
Appellate Case No. 2015-000904

Dear Ms. Kitchings:

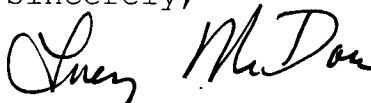
Enclosed for filing are the originals and six copies of the following two motions, to which the appellant's attorney has kindly consented:

1. Motion for Substitution of Counsel for the respondent; and
2. Motion for Extension of Time to file the respondent's initial brief.

Also enclosed are proofs of service and the filing fees totaling \$50.00. I would appreciate the return of the clocked copies.

Thank you.

Sincerely,

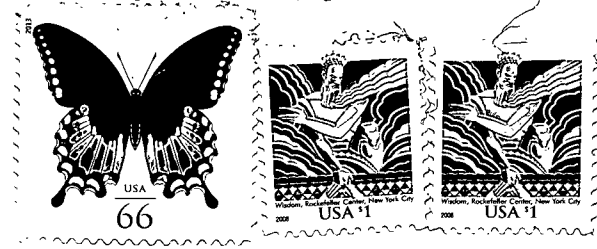
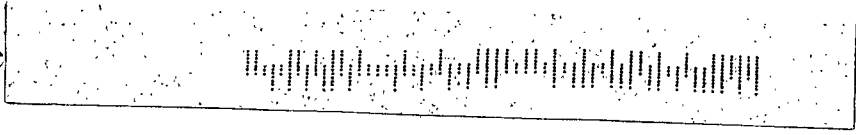


Lucy L. McDow

Enclosures
cc w/enc:

Philip E. Wright
Client

Lucy L. Mc
Attorney
P.O. Box 767
Rock Hill SC 29731-6767



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JUN 26 2015
SC Court of Appeals

|||||
The Honorable Jenny Abbott Kitchings
The South Carolina Court of Appeals
P.O. Box 11629
Columbia SC 29211