

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM ADMINISTRATIVE LAW COURT

Administrative Law Judge Deborah Brooks Durden

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NOV 20 2015

SC Court of Appeals

ALC Case No. 15-ALJ-04-0003-AP  
Appellate Case No. 2015-000379

Perry Watford, # 289215.....Appellant,

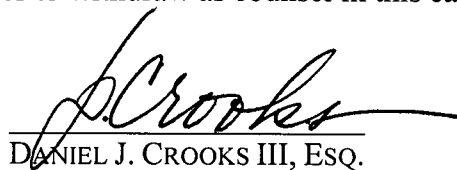
v.

South Carolina Department of Corrections.....Respondent.

**MOTION TO WITHDRAW AS COUNSEL**

COMES NOW the undersigned, pursuant to Rule 264, SCRAP, moves this Honorable Court for an order granting his petition to withdraw as counsel in this case. The bases for this Motion are the fact that the undersigned's last day of work with the Department of Corrections will be Wednesday, November 18, 2015, and the fact that Christina Catoe Bigelow, Esquire, has contemporaneously filed a Notice of Appearance.


WHEREFORE the undersigned moves to withdraw as counsel in this case.



DANIEL J. CROOKS III, ESQ.  
Post Office Box 21787  
Columbia, South Carolina 29221  
(803) 896-8508

November 17, 2015  
Columbia, South Carolina

**CONSENT OF DEPARTMENT:**

BY:   
CHRISTINA CATOE BIGELOW, ESQ.  
Counsel for Respondent, SCDC

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Perry Watford, # 289215.....Appellant,

v.

South Carolina Department of Corrections.....Respondent.

CERTIFICATE OF SERVICE

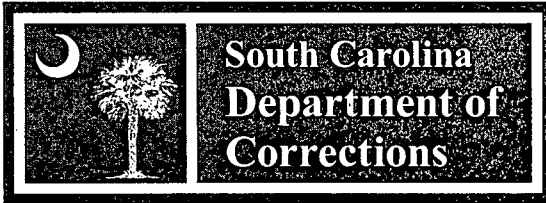
I hereby certify that I have served on Appellant the foregoing *Motion to Withdraw as Counsel* on today's date by depositing a copy of same in the United States Mail, postage prepaid, and addressed to Appellant at:

**Manning Correctional Institution  
502 Beckman Road  
Columbia, South Carolina 29203**



DANIEL J. CROOKS III, ESQ.  
Post Office Box 21787  
Columbia, South Carolina 29221  
(803) 896-8508

DATED: November 17, 2015



South Carolina  
Department of  
Corrections

NIKKI R. HALEY, Governor  
BRYAN P. STIRLING, Director

OFFICE OF GENERAL COUNSEL

November 17, 2015

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SC Court of Appeals

VIA INTERAGENCY MAIL

Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals

Reference Case Nos.: 2015-001761, *Alexander v. SCDC* (3)  
2013-002692, *Bentley v. SCDC*  
2014-000461, *Bolin v. SCDC*  
2015-001837, *Booker v. SCDC* (4)  
2015-002126, *Booker v. SCDC* (5)  
2014-001481, *Campbell v. SCDC*  
2014-001060, *Carter v. SCDC* (3)  
2015-000183, *Cleveland v. SCDC*  
2014-002613, *Daniels v. SCDC*  
2015-002114, *Ford v. SCDC* (2)  
2014-002040, *Fowler v. SCDC*  
2014-001684, *Fullbright v. SCDC*  
2014-002356, *Goins v. SCDC* (5)  
2012-213396, *Lisenby v. SCDC* (7) & (8)  
2013-000852, *Lisenby v. SCDC* (10)  
2013-000864, *Lisenby v. SCDC* (11)  
2013-000958, *Lisenby v. SCDC* (12)  
2015-002276, *Roberson v. SCDC*  
2015-001519, *Sellers v. SCDC*  
2015-001403, *Sparrow v. SCDC*  
2015-000379, *Watford v. SCDC*  
2015-000060, *Young v. SCDC*

Dear Ms. Kitchings:

Enclosed herein, please find the original and one (1) copy of my *Motion to Withdraw as Counsel* in each of the above-referenced cases. Kindly file the originals and date-stamp and return the copies to me in the enclosed inter-agency envelope.

Sincerely,

Daniel J. Crooks III

SC Court of Appeals

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Office of General Counsel  
P.O. Box 21787/4444 Broad River Road  
Columbia, South Carolina 29221-1787

# INTER-AGENCY MAIL

Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
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SC Court of Appeals

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