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IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

NOV 24 2015

SC Court of Appeals

APPEAL FROM BAMBERG COUNTY
Court of Common Pleas

Clifton Newman, Circuit Court Judge

Case No.: 2011-CP-05-65

Claude McAlhaney,Appellant.

-vs-

Kenneth A. Carter, Sr., Kenneth A. Carter, Sr. d/b/a Carter & Son Pest Control, Carter & Son
Pest Control, Inc. and Erick Cogburn,Respondents.

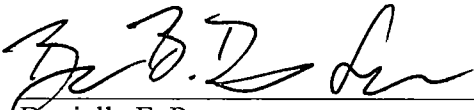
MOTION FOR SUBSTITUTION OF COUNSEL

THIS MATTER COMES before the Court on joint motion of Danielle F. Payne, Esquire of McAngus Goudelock & Courie, LLC, (formerly of Grier Cox and Cranshaw, LLC) and James C. Cox, III, Esquire of Grier Cox and Cranshaw, LLC, as evidenced by their below signatures, who hereby move the Court for an Order substituting Attorney James C. Cox, III for Attorney Danielle F. Payne as counsel of record for Respondent Kenneth A. Carter, Sr. Kenneth A. Carter, Sr. d/b/a Carter & Son Pest Control, Carter & Son Pest Control, Inc. (hereinafter, "Respondent Carter"). The grounds for this Motion are that Attorney Payne is no longer with

the firm of Grier Cox and Cranshaw and the insurance carrier for Respondent Carter has requested the firm of Grier Cox and Cranshaw, LLC continue representation of Respondent Carter through Attorney Cox.

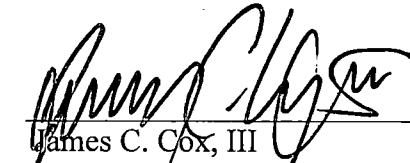
This Motion shall be further based upon any such additional information as may be deemed necessary and acceptable by the court.

I SO MOVE AND CONSENT:



Danielle F. Payne
McAngus Goudelock & Courie, LLC
735 Johnnie Dodds Blvd.
Ste 200
Mt. Pleasant, SC 29464
(843)576-2900

I SO MOVE AND CONSENT:



James C. Cox, III
Grier, Cox & Cranshaw, LLC
Post Office Box 2823
Columbia, South Carolina 29202
(803) 731-0030

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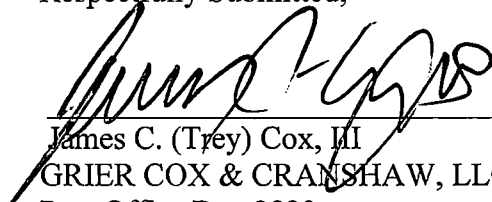
PROOF OF SERVICE

I certify that I have served the Motion for Substitution of Counsel upon the addressees listed below by depositing a true copy in the United States Mail, First Class postage prepaid, on **November 24, 2015**.

William F. Barnes, III, Esquire
Peters, Murdaugh, Parker Eltzroth &
Detrick, P.A.
Post Office Box 457
Hampton, SC 29924

Richard Ness, Esquire
Ness & Jett, LLC
P.O. Box 909
Bamberg, SC 29003

Respectfully Submitted,



James C. (Trey) Cox, III
GRIER COX & CRANSHAW, LLC
Post Office Box 2823
Columbia, South Carolina 29202
Tele: (803)731-0030
Fax: (803)731-4059

**ATTORNEY FOR DEFENDANT KENNETH A.
CARTER, SR., KENNETH A. CARTER, SR.
D/B/A CARTER & SON PEST CONTROL,
CARTER & SON PEST CONTROL, INC.**

GRIER, COX & CRANSHAW, LLC

ATTORNEYS AT LAW

2999 Sunset Boulevard, Suite 200
West Columbia, South Carolina 29169

Telephone (803) 731-0030

Facsimile (803) 731-4059

E-mail: TCox@GrierCoxandCranshaw.com

Website: www.GrierCoxandCranshaw.com

F. Barron Grier, III*
James C. (Trey) Cox, III
Bradford W. Cranshaw
Trey Matthew Nicolette
Trevor M. Hughey**

Mailing Address

Post Office Box 2823
Columbia, South Carolina
29202

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SC Court of Appeals

* Also Certified Mediator and Arbitrator

**Attorney Licensed in SC & NC

November 24, 2015

VIA HAND-DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11639
Columbia, South Carolina 29211

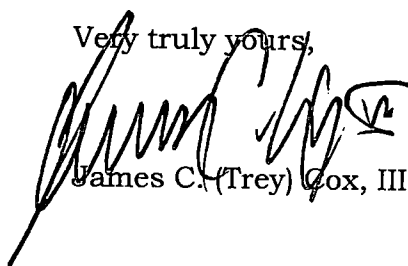
Re: Claude McAlhany v. Kenneth A. Carter, Sr., Erick Cogburn, et al.
C/A No.: 2011-CP-05-65
Appellate Case No. 2013-000578
Our File #: 005-237

Dear Ms. Kitchings:

Please grant me a 10-day extension of time to file and serve the Respondent's Petition for Rehearing. Respondents seek this extension on the grounds that the motion for the substitution of new counsel for Kenneth A. Carter, Sr. et al. has not yet been granted by the Court and on the grounds that its Petition for Rehearing is currently due on November 27, 2015, which is the Friday after Thanksgiving. Given the forgoing, Respondents move this Court to extend the deadline to file a Petition for Rehearing to Friday, December 4, 2015.

With kindest regards, I remain

Very truly yours,



James C. (Trey) Cox, III

JCC, III/kjm

Enclosure

cc: William F. Barnes, III, Esquire
Richard B. Ness, Esquire

GRIER, COX & CRANSHAW, LLC

ATTORNEYS AT LAW

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The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11639
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Re: Claude McAlhany v. Kenneth A. Carter, Sr., Erick Cogburn, et al.
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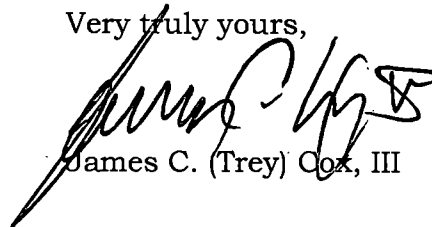
Dear Ms. Kitchings:

Please find enclosed the original and six (6) copies of Respondents Motion for Substitution of Counsel with regards to the above-referenced matter. Please return a filed copy of the same in the envelope provided.

By copy of this letter, Respondent's Motion for Substitution of Counsel is being served on all counsel of record.

With kindest regards, I remain

Very truly yours,



James C. (Trey) Cox, III

JCC, III/vnc

Enclosure

cc: William F. Barnes, III, Esquire
Richard B. Ness, Esquire