

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

79576

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

RECEIVED

The Honorable Clifton Newman, Circuit Court Judge

MAY 16 2016

SC Court of Appeals

Consolidated Case No. 2010-CP-10-2271

CONCORD AND CUMBERLAND HORIZONTAL PROPERTY REGIME, and THOMAS R. MATHER, and BETTY Y. SEGAL, and SIGNATURE CHARLESTON, LLC and WADE ROBINSON, and JAMES C. KIRKPATRICK, and PAUL A. BRIM, and FRED RAPPAPORT and JOYCE RAPPAPORT, and THOMAS R. DEBNAM, as TRUSTEE OF THE TRUST AGREEMENT OF THOMAS R. DEBNAM, and PAMELA L. VAUGHAN, and 304 CONCORD & CUMBERLAND, LLC, and 402 CONCORD & CUMBERLAND, LLC and AVANT & ASSOCIATES, LLC and OAKLAND HOLDING, LLC and MATTISON J. MacGILLIVRAY and TERESA E. MacGILLIVRAY and PAMELA QUEEN, and STUART REEVES,..... Plaintiffs,

v.

CONCORD & CUMBERLAND, LLC, CONCORD & CUMBERLAND MANAGER, LLC, ESTATES, INC., ESTATES MANAGEMENT COMPANY, SUPERIOR CONSTRUCTION CORPORATION, WEATHER SHIELD MGF., INC., THE MUHLER COMPANY, INC., IN THE WIND, INC., J. DAVIS ARCHITECTS, PLLC, WALL CRAFT CONSTRUCTION, INC., WEATHERHOLTZ MASONRY, LLC, PHILIP GASQUE d/b/a PHILIP GASQUE CONSTRUCTION, ARCHITECTURAL STONE COMPANY, SOUTHERN MECHANICAL, INC., GREG GASQUE METAL WORKS, KEATING ROOFING AND SHEET METAL, INC., LOWCOUNTRY TILE CONTRACTORS, INC., SAFECO INSURANCE COMPANY OF AMERICA, COMPANION PROPERTY AND CASUALTY OF AMERICA, COMPANION PROPERTY AND CASUALTY GROUP, WATTS BUILDERS, LLC, ELIAS DUFFY d/b/a MASONRY PROS, RENAISSANCE STEEL, LLC, AMERICAN DRYWALL CONSTRUCTION, INC., TURNER ELECTRICAL OF SC, INC. and METRO WATERPROOFING, INC., Defendants,

Of Whom,

SUPERIOR CONSTRUCTION CORPORATION is the.....Appellant,

and

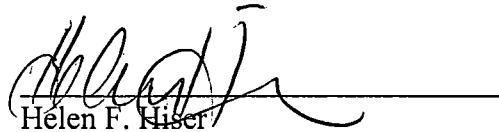
THE MUHLER COMPANY, INC. is the.....Respondent.

**MOTION TO ALLOW
WITHDRAWAL OF REPRESENTATION**

Pursuant to Rules 240 and 264(b), SCACR, Respondent The Muhler Company, Inc. hereby moves this Court to allow Helen F. Hiser to withdraw from representation of Respondent

The Muhler Company in the above-captioned appeal. This matter is being handled by Peter Gunnar Nistad, Esq., who is no longer with McAngus Goudelock & Courie. Mr. Nistad will continue to represent Respondent The Muhler Company, Inc. in this appeal.

Respectfully submitted,
MCANGUS GOUDELOCK & COURIE

A handwritten signature in black ink, appearing to read 'Helen F. Hiser', is written over a horizontal line. The signature is stylized and cursive.

Helen F. Hiser
S.C. Bar No.: 76124
735 Johnnie Dodds Blvd., Suite 200
P.O. Box 650007
Mount Pleasant, South Carolina 29465
(843) 576-2900

May 11, 2016

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v.

CONCORD & CUMBERLAND, LLC, CONCORD & CUMBERLAND MANAGER, LLC, ESTATES, INC., ESTATES MANAGEMENT COMPANY, SUPERIOR CONSTRUCTION CORPORATION, WEATHER SHIELD MGF., INC., THE MUHLER COMPANY, INC., IN THE WIND, INC., J. DAVIS ARCHITECTS, PLLC, WALL CRAFT CONSTRUCTION, INC., WEATHERHOLTZ MASONRY, LLC, PHILIP GASQUE d/b/a PHILIP GASQUE CONSTRUCTION, ARCHITECTURAL STONE COMPANY, SOUTHERN MECHANICAL, INC., GREG GASQUE METAL WORKS, KEATING ROOFING AND SHEET METAL, INC., LOWCOUNTRY TILE CONTRACTORS, INC., SAFECO INSURANCE COMPANY OF AMERICA, COMPANION PROPERTY AND CASUALTY OF AMERICA, COMPANION PROPERTY AND CASUALTY GROUP, WATTS BUILDERS, LLC, ELIAS DUFFY d/b/a MASONRY PROS, RENAISSANCE STEEL, LLC, AMERICAN DRYWALL CONSTRUCTION, INC., TURNER ELECTRICAL OF SC, INC. and METRO WATERPROOFING, INC., Defendants,

Of Whom,

SUPERIOR CONSTRUCTION CORPORATION is the Appellant,

and

THE MUHLER COMPANY, INC. is the Respondent.

PROOF OF SERVICE

I certify that on the 11th day of May 2016, I served the Respondent's **Motion to Allow Withdrawal of Representation** on counsel of record by depositing a copy of it in the United States Mail, postage prepaid, addressed as follows:

Chris A. Majure, Esq.
MURPHEY & GRANTLAND, PA
P.O. Box 6648
Columbia, SC 29260

Peter Gunnar Nistad, Esq.
GALLIVAN, WHITE & BOYD, PA
40 Calhoun Street, Suite 315
Charleston, SC 29401

Christine Companion Varnado, Esq.
THE SEIBELS LAW FIRM, P.A.
38 Broad Street, Suite 200
Charleston, SC 29401



Michaela Shepherd
Legal Assistant to Helen F. Hiser
McAngus, Goudelock & Courie LLC
735 Johnnie Dodds Blvd., Suite 200
P.O. Box 650007
Mount Pleasant, South Carolina 29465
(843) 576-2900

mgc

Reply To

HELEN F. HISER
Direct Dial: (843) 576-2930
helen.hiser@mgclaw.com

May 11, 2016

Via U.S. Mail

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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SC Court of Appeals


RE: Concord and Cumberland Horizontal Property Regime v. Concord & Cumberland, LLC; Concord & Cumberland Manager, LLC; Estates, Inc.; Superior Construction Corporation; Weather Shield Mfg., Inc.; The Muhler Company, Inc.; In the Wind, Inc.; J. Davis Architects, PLLC; Wall Craft Construction, Inc.; Weatherholtz Masonry, LLC; Philip Gasque d/b/a Philip Gasque Construction; Architectural Stone Company; Southern Mechanical, Inc.; Greg Gasque Metal Works; Keating Roofing and Sheet Metal, Inc.; Lowcountry Tile Contractors, Inc.; Safeco Insurance Company of America; Companion Property and Casualty Group; Watts Builders, LLC; Elias Duffy d/b/a Masonry Pros; Renaissance Steel, LLC; American Drywall Construction, Inc.; Turner Electrical of SC, Inc.; and Metro Waterproofing, Inc.
Civil Action No.: 2010-CP-10-2271 (Charleston)
Carrier Claim No.: 703302560001
MGC File No.: 20617.08082
Appeal No.: 2016-000076

Dear Ms. Kitchings:

Enclosed for filing please find the original and seven (7) copies of Respondent The Muhler Company's Motion Allow Withdrawal of Representation in the above-referenced matter, along with a Proof of Service of the same on Respondent. Also enclosed is our firm's check in the amount of \$25 for filing the motion.

Please file the original documents and return the clocked-in copies in the enclosed, self-addressed envelope. If you have any questions, please do not hesitate to contact me.

Very truly yours,


Helen F. Hiser

The Honorable Jenny Abbott Kitchings
May 11, 2016
Page 2

cc: Christopher Majure, Esq.
Peter Gunnar Nistad, Esq.
Christine Companion Varnardo
Ron Sykora, The Muhler Company, Inc.



mgc | **INSURANCE
DEFENSE**

POST OFFICE BOX 650007
MT. PLEASANT, SC 29465

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