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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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JUL 20 2016

SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

G. Thomas Cooper, Jr., Circuit Court Judge

C.A. No.: 2011-CP-10-00387  
Appellate Case No. 2016-001140

PCS Nitrogen, Inc. .... Appellant,

vs.

Continental Casualty Company, Admiral Insurance Company,  
United States Fire Insurance Company, ACE Property & Casualty  
Insurance Company, Certain Underwriters at Lloyd's London, the  
Aviva Companies, the Winterthur Companies, Certain London  
Market Insurance Companies, Providence Washington Insurance  
Company (as Successor in Interest by way of Merger to Seaton  
Insurance Company, f/k/a Unigard Security Insurance, f/k/a  
Unigard Mutual Insurance Company), Berkshire Hathaway Specialty  
Insurance Company (f/k/a Stonewall Insurance Company),  
Lexington Insurance Company, Starr Indemnity & Liability  
Company (f/k/a Republic Insurance Company), First State Insurance  
Company, Century Indemnity Company (f/k/a California Union  
Insurance Company and Insurance Company of North America..... Respondents.

**MOTION FOR SUBSTITUTION OF COUNSEL**

Pursuant to Rule 224 of the South Carolina Appellate Court Rules, John T. Lay and  
Laura W. Jordan of the law firm of Gallivan, White & Boyd, P.A., move this Court for an Order  
of Substitution to appoint them as counsel for Respondent Certain London Market Insurance  
Companies in place of John Irvin Malone, Jr. of Goldberg Segalla. Helen A. Franzese of Foran  
Glennon Palandach Ponzi & Rudloff, PC (formerly of Goldberg Segalla) will remain as co-  
counsel for Respondent Certain London Market Insurance Companies.

This motion is based upon Respondent's desire to retain John T. Lay and Laura W. Jordan for purposes of this appeal. John Irvin Malone, Jr., and Helen A. Franzese, counsel of record for Respondent Certain London Market Insurance Companies, consent to this motion.

WE SO MOVE:

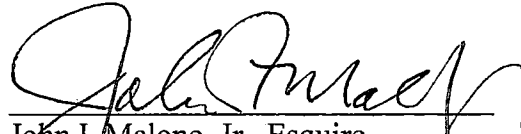
GALLIVAN, WHITE & BOYD, P.A.



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1201 Main Street, Suite 1200  
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WE SO CONSENT:

GOLDBERG SEGALLA



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20<sup>th</sup> day of July, 2016

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Company (as Successor in Interest by way of Merger to Seaton  
Insurance Company, f/k/a Unigard Security Insurance, f/k/a  
Unigard Mutual Insurance Company), Berkshire Hathaway Specialty  
Insurance Company (f/k/a Stonewall Insurance Company),  
Lexington Insurance Company, Starr Indemnity & Liability  
Company (f/k/a Republic Insurance Company), First State Insurance  
Company, Century Indemnity Company (f/k/a California Union  
Insurance Company and Insurance Company of North America..... Respondents.

**PROOF OF SERVICE**

I, the undersigned employee of Gallivan, White & Boyd, P.A., do hereby certify  
that I have caused the below referenced to be served via U.S. mail, postage prepaid, *or by  
other delivery as indicated*, to all parties of record at the address(es) shown below.

**DOCUMENT(S) SERVED:**

1. Motion for Substitution of Counsel

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July 20, 2016

**RECEIVED**  
JUL 20 2016  
SC Court of Appeals

**VIA HAND-DELIVERY**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

Re: *PCS Nitrogen, Inc. v. Certain London Market Insurance Companies,*  
*et al.*  
Appellate Case No. 2016-001140

Dear Ms. Kitchings:

On behalf of Certain London Market Insurance Companies, enclosed for filing with your office is the original and seven copies of our Motion for Substitution of Counsel in the above-referenced matter, and a check in the amount of \$25 to cover the cost of filing. I would appreciate you filing the original and returning a clocked copy to me via our courier. Thank you for your assistance in this matter.

By copy of this letter, I am serving a copy of the same on counsel of record.

With kind regards, I am

Sincerely,

GALLIVAN, WHITE & BOYD, P.A.

Laura W. Jordan

LWJ:kcc  
Enclosures

cc: All Counsel of Record