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THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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APPEAL FROM THE ADMINISTRATIVE LAW COURT

SEP 22 2016

Deborah Brooks Durden, Administrative Law Court

SC Court of Appeals

Case No. 15-ALC-15-0033-AP  
Appellate Case No. 2016-000225

David Rose, #91858, ..... Respondent,

v.

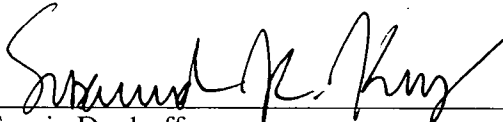
South Carolina Department of Probation, Parole and Appellant.  
Pardon Services,.....

**RESPONDENT'S MOTION FOR WITHDRAWAL OF  
SUSANNAH KNOX AS COUNSEL OF RECORD**

Respondent David Rose hereby moves this Court for an Order allowing the withdrawal of Susannah Knox of Nelson Mullins Riley & Scarborough LLP as counsel of record, as Ms. Knox is leaving the firm. Travis Dayhuff of Nelson Mullins will continue serving as counsel of record for Mr. Rose. Counsel for Appellant has consented to this Motion.

In addition, the undersigned hereby confirms that Mr. Rose has been informed that he will continue to be represented by Attorney Dayhuff of Nelson Mullins, who is currently listed as counsel of record for Respondent in this appeal.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By:  \_\_\_\_\_

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Attorneys for David Rose

Columbia, South Carolina

Sept. 21, 2016

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David Rose, #91858, ..... Respondent,

v.

South Carolina Department of Probation, Parole and Appellant.  
Pardon Services,.....

**ORDER GRANTING MOTION  
FOR WITHDRAWAL OF COUNSEL**

This matter is before the Court upon motion of Respondent, David Rose, for an order withdrawing Susannah Knox of Nelson Mullins Riley & Scarborough, LLP, as its counsel of record. Travis Dayhuff of Nelson Mullins Riley & Scarborough, LLP, will remain serving as counsel of record for Mr. Rose.

The Court finds that good cause has been shown.

It is therefore ORDERED that Susannah Knox of Nelson Mullins Riley & Scarborough, LLP, is withdrawn as counsel of record for Respondent, David Rose. Attorney Dayhuff will continue to represent Mr. Rose in this appeal.

*Signature on following page*

AND IT IS SO ORDERED.

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September \_\_\_\_\_, 2016

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Deborah Brooks Durden, Administrative Law Court

Case No. 15-ALC-15-0033-AP  
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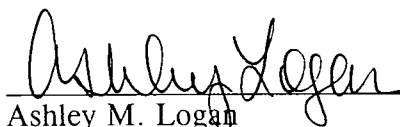
South Carolina Department of Probation, Parole and Appellant.  
Pardon Services,.....

**CERTIFICATE OF SERVICE**

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for David Rose, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by having them mailed via United States Postal Service to the following address(es):

Pleadings: (1) RESPONDENT'S MOTION FOR WITHDRAWAL OF  
SUSANNAH KNOX AS COUNSEL OF RECORD (2)  
PROPOSED ORDER (3) CERTIFICATE OF SERVICE

Counsel Served: Matthew C. Buchanan, Esquire  
S.C. Department of Probation, Parole and Pardon Services  
2221 Devine Street  
P.O. Box 50666  
Columbia, SC 29250



Ashley M. Logan  
Administrative Assistant

September 21, 2016

# Nelson Mullins

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Susannah Knox  
Tel: 843.534.4414  
susannah.knox@nelsonmullins.com

September 21, 2016

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

**RECEIVED**  
SEP 22 2016  
SC Court of Appeals

RE: David Lee Rose #91858 v. South Carolina Department of Probation, Parole  
and Pardon Services  
Appellate Case No. 2016-000225  
Our File No. 33999/01227

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter are the original and 6 copies of Respondent's Motion for Withdrawal of Susannah Knox as Counsel of Record, Proposed Order, Certificate of Service and the \$25.00 filing fee. Please return a clocked-in copy of same via the self-addressed, postage paid envelope enclosed.

By copy of this letter to opposing counsel, we are hereby serving them with a copy of this filing.

Very truly yours,



Susannah Knox

SRK/aml  
Enclosures  
cc: Travis Dayhuff, Esquire  
Matthew C. Buchanan, Esquire