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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

JAN 11 2017

Kristi Lea Harrington, Circuit Court Judge

**SC Court of Appeals**

Appellate Case No. 2015-000940

D.A. Morgan Price, ..... Respondent,

v.

Todd Chas, Jacara Chas, Marsh Winds Owners Association, Inc. a/k/a Marsh Winds Horizontal  
Property Regime, and The Marshland Communities, LLC, Defendants,

Of Whom Todd Chas and Jacara Chas are the ..... Appellants.

**MOTION FOR SUBSTITUTION OF COUNSEL**

TO: HONORABLE JENNY ABBOTT KITCHINGS, CLERK OF COURT, SOUTH  
CAROLINA COURT OF APPEALS:

Appellants, Todd Chas and Jacara Chas, with the consent of William A. Scott, Esquire, of  
Pedersen & Scott, P.C., hereby move this Court for an Order authorizing the withdrawal of William  
A. Scott, and the law firm of Pedersen & Scott, P.C., as counsel for Appellants, and substituting  
Jeffrey S. Tibbals, and Alexandra H. Austin, and the law firm of NEXSEN PRUET, LLC, as counsel  
for Appellants in this matter. The consents of counsel and Appellants are indicated below.

WE SO MOVE:

  
\_\_\_\_\_

Jeffrey S. Tibbals  
Alexandra H. Austin  
NEXSEN PRUET, LLC  
205 King Street, Suite 400 (29401)  
P.O. Box 486  
Charleston, SC 29402  
PHONE: 843.577.9440  
FACSIMILE: 843.414.8222  
JTibbals@nexsenpruet.com  
AAustin@nexsenpruet.com

Attorneys for Appellants

January 9, 2017  
Charleston, South Carolina

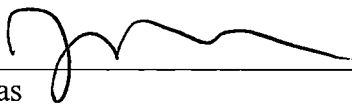
I SO CONSENT:

  
\_\_\_\_\_

William A. Scott  
Pedersen & Scott, P.C.  
775 St. Andrews Blvd.  
Charleston, SC 29407

January 6, 2017

WE SO CONSENT:

  
\_\_\_\_\_

January 6, 2017

  
\_\_\_\_\_  
Jacara Chas

January 6, 2017

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v.

Todd Chas, Jacara Chas, Marsh Winds Owners Association, Inc. a/k/a Marsh Winds  
Horizontal Property Regime, and the Marshland Communities, LLC, Defendants,

Of whom Todd Chas and Jacara Chas are the ..... Appellants.

**PROOF OF SERVICE**

I, Jeffrey S. Tibbals, Esquire, hereby certify that on the 9<sup>th</sup> day of January, 2017, I served a copy of Appellants' MOTION FOR SUBSTITUTION OF COUNSEL, submitted by Appellants Todd Chas and Jacara Chas, upon counsel for Respondent and former counsel for Appellants by mailing copies to them via United States Mail, postage prepaid, and addressed as follows:

Andrew S. Radeker  
Harrison & Radeker, P.A.  
P.O. Box 50143  
Columbia, South Carolina 29250

William A. Scott  
Pedersen & Scott, P.C.  
775 St. Andrews Blvd.  
Charleston, South Carolina 29407



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Jeffrey S. Tibbals

Alexandra H. Austin

NEXSEN PRUET, LLC

205 King Street, Suite 400 (29401)

P.O. Box 486

Charleston, SC 29402

843.577.9440

Attorneys for Appellants

January 9, 2017

# NEXSEN|PRUET

**Jeffrey S. Tibbals**  
Member  
Admitted in MD, VA, DC, SC

January 9, 2017

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JAN 11 2017

**SC Court of Appeals**

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

Re: *D.A. Morgan Price v. Todd Chas, Jacara Chas, et al.*  
Appellate Case No. 2015-000940

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of Appellants' Motion for Substitution of Counsel in the above-referenced matter. Also enclosed is this firm's check in the amount of \$25.00 to cover the applicable motion filing fee. Please file the original and return the file-stamped copy in the enclosed, postage-paid envelope.

By copy of this letter, I have served counsel for Respondent and former counsel for Appellant, as indicated in the Proof of Service.

Sincerely,



Jeffrey S. Tibbals

JST/ksh

Enclosures

cc: Alexandra H. Austin  
Andrew S. Radeker  
William A. Scott

Charleston

Charlotte

Columbia

Greensboro

Greenville

Hilton Head

Myrtle Beach

Raleigh

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Nexsen Pruet, LLC

**Attorneys and Counselors at Law**

Hasler

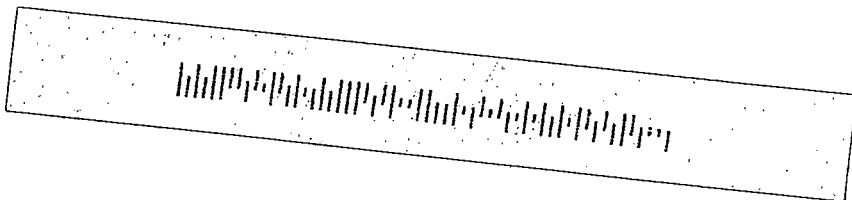
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**NEXSEN | PRUET**

P. O. Box 486  
Charleston SC 29402

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

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