

THE STATE OF SOUTH CAROLINA  
In The State Supreme Court

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APR 12 2017

APPEAL FROM ORANGEBURG COUNTY  
Court of Common Pleas

S.C. SUPREME COURT

The Honorable James B. Jackson, Jr.  
Special Circuit Court Judge

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Case No. 2012-CP-38-01314  
Appellate Case No. 2014-002402  
Appellate Case No. 2016-001543

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Jennifer Middleton, as parent and GAL for Jane Doe.....Petitioner,

v.

Orangeburg Consolidated School District Three.....Respondent.

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**MOTION FOR WITHDRAWAL AND SUBSTITUTION OF COUNSEL**

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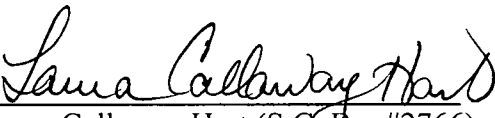
TO: THE STATE SUPREME COURT FOR THE STATE OF SOUTH CAROLINA

PLEASE TAKE NOTICE that Respondent, Orangeburg Consolidated School District Three, by and through its undersigned counsel, respectfully moves this Court for an Order permitting Laura Callaway Hart, Esq., and the law firm of Duff & White, LLC, now known as Duff & Childs, LLC, to withdraw as counsel and substituting the law firm of White & Story, LLC, as counsel for Respondent. The ground for this withdrawal and substitution is that as of April 1, 2017, Andrea E. White, Esq., who has and will continue to serve as counsel of record for Respondent, is no longer employed by Duff & White,

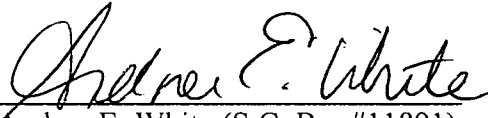
LLC, and is now a member and employed by the newly formed White & Story, LLC, P.O. Box 7036, Columbia, SC 29202, Telephone 803.814.0993.

Respondent respectfully requests that Laura Callaway Hart, Esq., and the firm of Duff & White, LLC, now known as Duff & Childs, LLC, be relieved as counsel for Respondent and that the firm of White & Story, LLC, be substituted as counsel for Respondent. Andrea E. White of the firm White & Story, LLC, will continue to serve as counsel of record for Respondent.

**WE SO MOVE AND CONSENT:**

  
Laura Callaway Hart (S.C. Bar #2766)  
Duff & Childs, LLC  
P.O. Box 1486  
Columbia, SC 29202

March 31, 2017

  
Andrea E. White (S.C. Bar #11891)  
White & Story, LLC  
P.O. Box 7036  
Columbia, SC 29202

March 31, 2017

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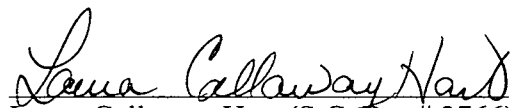
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**PROOF OF SERVICE**

I certify that I have served Respondent Orangeburg Consolidated School District Three's Motion for Withdrawal and Substitution of Counsel on Jennifer Middleton, as parent and GAL for Jane Doe, by depositing a copy in the United States Mail, postage prepaid, on April 11, 2017, addressed to her attorney of record, R. Bentz Kirby, Esq., Law Office of Glenn Walters, P. O. Box 1346, Orangeburg, South Carolina 29116.

April 10, 2017

  
Laura Callaway Hart (S.C. Bar # 2766)  
DUFF & CHILDS, L.L.C.  
P. O. Box 1486  
Columbia, SC 29202  
803.790.0603

Attorney for Respondent

(CONTINUED ON NEXT PAGE)

R. Bentz Kirby, Esq.  
Law Office of Glenn Walters  
P. O. Box 1346  
Orangeburg, SC 29116

Attorney for Appellant

Other Counsel of Record:

Andrea E. White, Esq.  
White & Story, L.L.C.  
P. O. Box 7036  
Columbia, SC 29202

Attorney for Respondent