

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

Case No.: 2014-CP-26-07862  
Appellate Case no.: 2016-000522

**RECEIVED**  
MAY 04 2017  
SC Court of Appeals

Rabon & Rabon, Inc. ....Respondent,

vs.

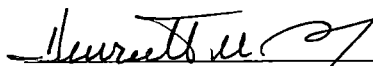
Karon Mitchell and Kyle Mitchell, ..... Appellants,

MOTION TO WITHDRAW AS COUNSEL

The undersigned counsel, Henrietta U. Golding, pursuant to SCACR Rule 264(b) hereby moves before this Court to withdraw as counsel for Rabon & Rabon, Inc., the Respondent in the above-captioned matter. Lane D. Jefferies, left the employ of McNair Law Firm, P.A. and is now in the employ of The Law Office of Natasha M. Hanna, P.C. Lane D. Jefferies will continue to represent the Respondent in this matter in accordance with the Respondent's instructions as shown on the attached Exhibit A. Further, Tucker Player, Attorney for Appellants hereby consents.

Respectfully submitted,

McNair Law Firm, P.A.



Henrietta U. Golding (S.C. Bar no. 2173)

McNair Law Firm, P.A.

P. O. Box 336 (29578)

2411 N. Oak St., Suite 206

Myrtle Beach, SC 29577

Ph: (843) 444-1107

Fax: (843) 444-3975

Email: [hgolding@mcnair.net](mailto:hgolding@mcnair.net)

Myrtle Beach, South Carolina

Dated: 5/3/17

February 27, 2017

Henrietta U. Golding

hgolding@mcnair.net  
T 843.444.1107  
F 843.444.4729

Jack Isaiah Rabon, Jr.  
Rabon & Rabon, Inc.  
308 7th Avenue North  
Myrtle Beach, South Carolina 29577

*201 North Oak Street  
Myrtle Beach, SC 29577*

Re: C/M#: 062992.00001

Dear Mr. Rabon:

This letter is to inform you that effective February 24, 2017, Lane Jefferies is no longer associated with McNair Law Firm, P.A. We value our relationship with you and would like to keep you as a client by reassigning your file(s) to another attorney within the firm. However, you also have the option to direct that your file(s) be returned to you or be transferred with Lane Jefferies, or to be transferred to another attorney.

Under the Rules of Professional Conduct, McNair Law Firm, P.A. remains your attorneys and is responsible for your files unless you direct otherwise. We may need to file certain documents to confirm that you have new counsel, and your designation of another attorney to assume your representation will authorize us to make all such filings as may be appropriate. If you have multiple files with McNair Law Firm, P.A., you may wish to treat them differently. In that event, McNair Law Firm, P.A. will consider your request that McNair Law Firm, P.A. retain some but not all of your files and will respond to that request promptly. Please indicate your choice below on the enclosed copy of this letter and return the copy to McNair Law Firm, P.A. in the envelope provided as soon as possible as your decision may effect deadlines that could prejudice your rights.

We anticipate that any trust accounts maintained by McNair Law Firm, P.A. related to your file(s) will be handled the same as your file(s) related to those accounts.

If McNair Law Firm, P.A. entered into any contracts with third parties on your behalf, your designation of another attorney to assume your representation authorizes us to terminate that contract or assign that contract to your new attorney.

McNAIR LAW FIRM, P.A.  
Founders Centre  
2411 Oak Street, Suite 206  
Myrtle Beach, SC 29577

Mailing Address  
Post Office Box 336  
Myrtle Beach, SC 29578

mcnair.net

Exhibit A

Jack Isaiah Rabon, Jr.  
February 27, 2017  
Page 2

MCNAIR  
ATTORNEYS

---

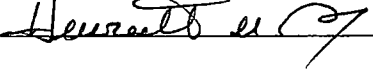
The Rules of Professional Conduct prohibit us from releasing your files to any other person without your written instructions and require McNair Law Firm to obtain a signed receipt from the person who collects your files. Further, McNair Law Firm, P.A. reserves the right to retain its own files, attorney's notes, copies of documents in your files, and McNair Law Firm, P.A.'s accounting and billing records relating to your engagement.

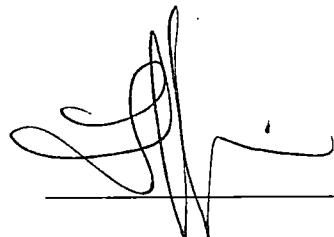
Attached to this letter is an invoice reflecting any outstanding account receivable, the costs advanced as posted through this date, and the previously unbilled time on your file(s). These are amounts you agreed to pay in your engagement letter. If you direct McNair Law Firm to release your file(s) either to you or to another lawyer, by doing so you agree to pay promptly all amounts reflected on the attached invoice.

If you have any questions, please do not hesitate to call Henrietta Golding at 843-444-1107.

Sincerely,

McNAIR LAW FIRM, P.A.

By:  \_\_\_\_\_  
Henrietta U. Golding

 \_\_\_\_\_  
Lane Jefferies

Attachment

Exhibit A

Please indicate your preference below, sign and return to

McNair Law Firm, P.A. in the envelope provided.

- Files and applicable trust account balances to be retained by McNair Law Firm, P.A.
- Files and applicable trust account balances to be delivered to Lane Jefferies, and client relationship with McNair Law Firm, P.A. terminated.
- Files and applicable trust account balances to be delivered to client, and client relationship with McNair Law Firm, P.A. terminated.
- Files and applicable trust account balances to be delivered to \_\_\_\_\_

\_\_\_\_\_, and client relationship with McNair Law Firm, P.A. terminated.

By:

Nicole Rabon  
Jack I. Rabon, Jr.  
SECRETARY / TREASURER  
Title PRESIDENT / VP  
4-3-17  
Date

Print Name:

NICOLE RABON  
JACK I. RABON, JR.

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM Horry COUNTY  
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

Case No.: 2014-CP-26-07862  
Appellate No.: 2016-000522

**RECEIVED**  
MAY 04 2017  
SC Court of Appeals

Rabon & Rabon, Inc. ....Respondent,

vs.

Karon Mitchell and Kyle Mitchell,..... Appellants.

PROOF OF SERVICE

I, Carole Koerner, an employee of McNair Law Firm, P.A., certify that I have served the Motion to Withdraw as Counsel and Proof of Service on all parties to this matter by depositing a copy in the United States Mail, first class postage prepaid on the 3<sup>rd</sup> day of May, 2017.

Counsel of Record:

Tucker S. Player, SC Bar # 16217  
Player Law Firm  
1415 Broad River Road  
Columbia, SC 29210  
Ph: 803.772.8008  
Fax: 803.772.8037  
Email: [tucker@playerlawfirm.com](mailto:tucker@playerlawfirm.com)

Lane D. Jefferies (S.C. Bar No.: 101764)  
THE LAW OFFICE OF NATASHA M.  
HANNA, P.C.  
4712 Jenn Drive, Suite A  
Myrtle Beach, SC 29577  
Ph: 843.839.8002  
Fax: 843.839.8011  
[Lane@NHannaLaw.com](mailto:Lane@NHannaLaw.com)

Myrtle Beach, South Carolina

  
Carole Koerner

May 3, 2017

Henrietta U. Golding

hgolding@mcnair.net  
T 843.444.1107

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

RECEIVED

MAY 04 2017

SC Court of Appeals

RE: Rabon & Rabon, Inc. v. Karon Mitchell  
Appellate Case No.: 2016-000522

Dear Ms. Kitchings:

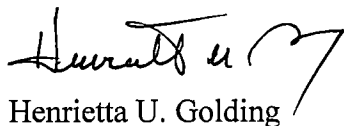
Enclosed for filing with the Court, please find original and seven copies of a Motion to Withdraw as Counsel and Proof of Service in the above matter. Also enclosed is a check in the amount of \$25.00 as the filing fee.

By copy of this letter to parties of record, and as shown of the Proof of Service, I hereby serve a copy of the aforementioned documents to the parties of record.

Please return to me one filed copy of the enclosed documents in the envelope provided herein.

Sincerely,

McNAIR LAW FIRM, P.A.



Henrietta U. Golding

HUG:ck

cc: Tucker S. Player, Esquire  
Lane D. Jefferies, Esquire

Enclosures

McNAIR LAW FIRM, P.A.  
Founders Centre  
2411 Oak Street, Suite 206  
Myrtle Beach, SC 29577

Mailing Address  
Post Office Box 336  
Myrtle Beach, SC 29578

mcnair.net



**MCNAIR** | McNair Law Firm, P.A.  
ATTORNEYS | Post Office Box 336  
Myrtle Beach, SC 29578  
www.mcnair.net

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

FIRST CLASS MAIL

**RECEIVED**  
MAY 04 2017  
SC Court of Appeals

