

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

APPEAL FROM BARNWELL COUNTY
Court of Common Pleas

AUG 25 2017
SC Court of Appeals

Doyet A. Early, III, Circuit Court Judge

Case No. 2017-000688

Martha M. Fountain and Curtis Fountain
Plaintiffs

v.

Fred's, Inc. and Wildevco, LLC, Respondents

v.

Tippins-Polk Construction, Inc. and Rhoad's Excavating Services, LLC.....
Defendants Third-Party

Of Whom Tippins-Polk Construction, Inc. is the Appellant.

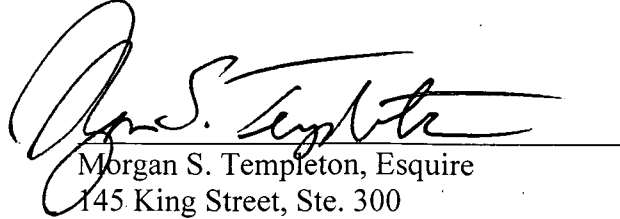
MOTION TO REMOVE COUNSEL WITHIN FIRM

PLEASE TAKE NOTICE THAT Third-Party Defendant/Appellant, Tippins-Polk Construction, Inc. is represented by Morgan S. Templeton of the law firm of Wall Templeton & Haldrup, P.A. Peden Brown McLeod, Jr., who is no longer with the firm and no longer represents Tippins-Polk Construction, Inc., seeks to be relieved as counsel in this matter. Mr.

Templeton will remain as counsel. All future pleadings, motions, notices and correspondence herein should be directed to the undersigned.

Dated this 22nd day of August, 2017.

WALL TEMPLETON & HALDRUP, P.A.

A handwritten signature in black ink, appearing to read "Morgan S. Templeton", is written over a horizontal line.

Morgan S. Templeton, Esquire
145 King Street, Ste. 300
Post Office Box 1200
Charleston, South Carolina 29402
843-329-9500
Attorneys for the Appellant

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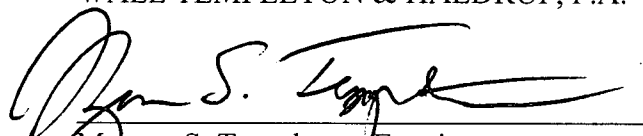
PROOF OF SERVICE

I, Morgan S. Templeton of Wall Templeton & Haldrup, do hereby certify that I have served the Notice of Removal of Counsel Within Firm on counsel for Respondents, by depositing the same in the United States Mail, properly posted on August 22, 2017 addressed as follows to counsel of record:

Lee Ellen Bagley, Esq.
Gaffney Lewis & Edwards
3700 Forest Drive, Suite 400
Columbia, South Carolina 29204

Matthew C. LaFave, Esq.
Crowe LaFave, LLC
Post Office Box 1149
Columbia, South Carolina 29202

WALL TEMPLETON & HALDRUP, P.A.

A handwritten signature in black ink, appearing to read "Morgan S. Templeton", is written over a horizontal line.

Morgan S. Templeton, Esquire
145 King Street, Ste. 300
Post Office Box 1200
Charleston, South Carolina 29402
843-329-9500
Attorneys for the Appellant



Wall Templeton
ATTORNEYS

Morgan S. Templeton
Morgan.Templeton@WallTempleton.com
Telephone: 843.329.9500 Ext. 209
Facsimile: 843.329.9501

August 22, 2017

The Honorable Jerry Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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SC Court of Appeals

Re: *Martha M. Foundain v. Fred's Inc., et al.*
Civil Action No.: 2010-CP-06-101

Dear Mr. Kitchings:

Please find enclosed an original and six (6) copies of a Motion to Relieve Peden Brown McLeod, Jr. As Counsel and Proof of Service in the above referenced matter. I am also enclosing the requisite \$25 filing fee. Please file the original with the Court and return a filed-stamped copy to me in the envelope provided for your convenience.

By copy of this letter to all counsel of record, I am serving them with the enclosed Motion.

Thank you for your time and attention to this matter.

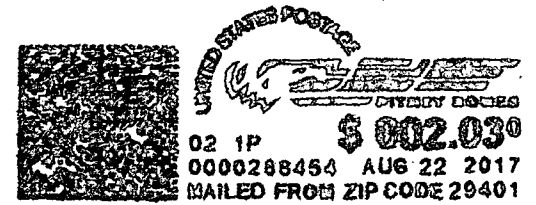
Sincerely,

WALL TEMPLETON & HALDRUP, P.A.

Morgan S. Templeton

MST/sjs
enclosures

cc: Lee Ellen Bagley, Esquire (w/ *encl*)
Matthew C. LaFave, Esquire (w/ *encl*)



FIRST CLASS MAIL



Wall Templeton
ATTORNEYS

145 King Street, Suite 300 (29401)
Post Office Box 1200
Charleston, South Carolina 29402

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