

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**EMERGENCY MOTION TO WITHDRAW AS COUNSEL**

Pursuant to Rule 240 and 264(b), SCACR, please allow this to serve as notice to the Court and all parties that John L. Warren III is leaving the law firm of Simmons Law Firm, LLC, and will be starting a federal judicial clerkship with the Hon. Donald C. Coggins, Jr. on December 11, 2017.<sup>1</sup> Thus, Mr. Warren will no longer be able to engage in the private practice of law. Canon 5(D), Rule 506, SCACR. Therefore, the undersigned moves to withdraw as counsel of record in the matters before this Court listed on Exhibit A to this motion. In light of the time sensitive nature of Mr. Warren's clerkship start date, Mr. Warren respectfully requests that the Court grant this Motion prior to December 8, 2017. All clients will remain represented by additional counsel of record. Therefore, no clients will remain unrepresented. Additionally, all clients are being notified in writing that a Motion to Withdraw has been filed.

Respectfully Submitted,

*John Warren* *#with express permission ET*

John L. Warren III, SC Bar #101414  
Simmons Law Firm, LLC  
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SC Court of Appeals

December 5, 2017

<sup>1</sup> Mr. Warren was offered the clerkship on November 27, 2017, and has been working diligently to get his cases in good order prior to filing this Motion to Withdraw as Counsel.

EXHIBIT A

*Melissa Leaphart Hagood v. James Buckner Hagood, Defendant; and Melody "Suzie" Hagood Sharpe, Third Party Defendant, 2016-001647*

*Paul Branco and Branco Investments, Inc., d/b/a Great American Cookie Co. v. Hull Storey Retail Group, LLC, and Sumter Mall, LLC, 2017-000998*

*The State v. Derek Vander Collier, 2015-000184*

*Nicholas Geer v. SCDPPPS, 2015-002522*

*James and Marietta Chaffin v. Richland County Sheriff's Department, Deputy Brian Metz, Investigator Roy Livingston, Tallie and Devra Lackey, individually and as the Parents to the Minor Child, 2015-001754*

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**PROOF OF SERVICE**

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The undersigned hereby certifies that on the date indicated below she served counsel with a copy of the *Emergency Motion to Withdraw as Counsel* by mailing copies of the same by United States Mail with first class postage prepaid to the following addresses:

James R. Snell, Jr.  
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Sumter, SC 29150

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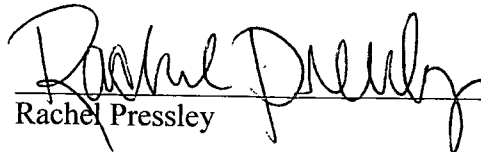
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December 5, 2017

  
Rachel Pressley

  
**SIMMONS**  
LAW FIRM

Reply to:  
JOHN L. WARREN III  
jwarren@simmonsfirm.com

December 5, 2017

**VIA HAND DELIVERY**

The Honorable Jenny Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

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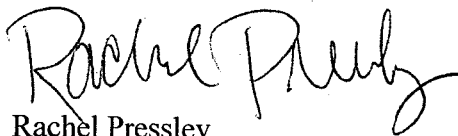
Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of an *Emergency Motion to Withdraw as Counsel* in reference to all matters for John L. Warren III before this Court as Mr. Warren is leaving private practice to start a federal judicial clerkship. I have enclosed a proof of service of this document on counsel and a \$25 check for filing this motion. Please return the additional filed copy to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

With best regards, I remain,

Very truly yours,



Rachel Pressley  
Legal Assistant to John L. Warren III

Enclosures