

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

Case No. 2017-002095

Elizabeth Earley, John Earley,
Lloyd Wilkins, Henry Kerns,
Margie Mills Kerns, Donna
Pearson, and Bruce Pearson

Appellant,

RECEIVED
JAN 19 2018
SC Court of Appeals

v.

The City of Woodruff, SC,
and The Terraces at Woodruff,
a South Carolina Limited
Liability Company

Respondent.

MOTION TO REMOVE AND SUBSTITUTE COUNSEL FOR RESPONDENT
THE TERRACES AT WOODRUFF, LLC

Counsel for Respondent the Terraces at Woodruff moves this Court to remove from the Record on Appeal attorney G. David Crocker from its list of counsel representing The Terraces at Woodruff in this matter. All other counsel of record at The Law Offices of Michael A. Graham, LLC remain the same.

January 19, 2018



Michael A. Graham #16863
Post Office Box 433
Columbia, South Carolina 29202
803-764-3919
Attorney for Respondent

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CERTIFICATE OF SERVICE

I certify that I have served the Respondent the Terraces at Woodruff, LLC Motion to Remove and Substitute Counsel for Respondent the Terraces at Woodruff, LLC on all parties by causing a copy of it to be deposited in the United States Mail, postage prepaid, on January 19, 2018, addressed to all counsel of record, Nathan A. Earle, Esquire, 1541 Wade Hampton Boulevard, Suite E, Greenville, South Carolina 29609, Danny C. Crowe, P. O. Box 1149, Columbia, South Carolina 29202.

January 19, 2018



Michael A. Graham #16863
Post Office Box 433
Columbia, South Carolina 29202
803-764-3919
Attorney for Respondent



Law Offices of Michael A. Graham, LLC

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January 19, 2018

Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED

JAN 19 2018

SC Court of Appeals

**RE: Earley, et al. v. City of Woodruff, et al.
Case # 2017-002095**

Dear Ms. Kitchings:

Enclosed please find the original and seven copies of the Respondents' The Terraces at Woodruff, LLC's Motion to Remove and Substitute Counsel in the above-referenced matter, with certificate of service. Please return one filed-stamped copy in the enclosed envelope.

I can be reached at (803)764-3919 with any questions about the filing.

Sincerely,

Michael A. Graham #16863
Post Office Box 433
Columbia, South Carolina 29202
803-764-3919
Attorney for Respondent