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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
In the Court of Common Pleas for the Ninth Circuit

J.C. Nicholson, Jr., Circuit Court Judge

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Appellate Case No. 2016-001986

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Shon Turner, as Personal Representative of the Estate of Charles  
Mikell, Deceased.....Appellant

v.

The Medical University of South Carolina.....Respondent

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MOTION OF ALISSA D. FLEMING, ESQ. TO BE RELIEVED AS COUNSEL

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M. Dawes Cooke, Jr., Esq.  
John W. Fletcher, Esq.  
Barnwell Whaley Patterson & Helms, LLC  
288 Meeting Street (29401)  
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Charleston, SC 29402  
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[jfletcher@barwnwell-whaley.com](mailto:jfletcher@barwnwell-whaley.com)  
*Attorneys for Respondent The Medical  
University of South Carolina*

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MAR 08 2018

SC Court of Appeals

**Other Counsel of Record:**

Robert B. Ransom, Esq.  
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***Attorneys for Appellant Shon Turner, as  
Personal Representative of the Estate of  
Charles Mikell, Deceased***

AND NOW COMES Alissa D. Fleming, Esq., formerly of the law firm of Barnwell Whaley Patterson & Helms, LLC, pursuant to S.C.R.A.P., Rule 264, and moves this Court for an Order to be relieved as counsel for Respondent The Medical University of South Carolina:

As grounds therefor Movant states:

1. This appeal has not yet been scheduled for oral argument.
2. Respondent The Medical University of South Carolina is being represented in this lawsuit by several attorneys, all of whom have appeared as counsel in this appeal:
  - (a) M. Dawes Cooke, Jr. of the law firm of Barnwell Whaley Patterson & Helms, LLC;
  - (b) John W. Fletcher of the law firm of Barnwell Whaley Patterson & Helms, LLC; and
  - (c) Alissa D. Fleming, Esq., formerly of the law firm of Barnwell Whaley Patterson & Helms, LLC (the movant herein).
3. Since entering her appearance in this case, Attorney Fleming has left the employment of the law firm of Barnwell Whaley Patterson & Helms, LLC.
4. As a result, Respondent wishes to have Attorney Fleming withdraw as its counsel in this matter and to be represented by Attorneys Cooke and Fletcher, who are already counsel of record.
5. With the consent of the client, the undersigned's appearance as counsel will be withdrawn and representation of Respondent will continue uninterrupted through Attorneys Cooke and Fletcher, who are all admitted to practice before this Court and have appeared as counsel of record.
6. Attorneys Cooke and Fletcher are prepared to participate in oral argument on behalf of Respondent.
7. For the foregoing reasons, Alissa D. Fleming, Esq., formerly of the law firm of Barnwell Whaley Patterson & Helms, LLC, request that the Court enter an Order withdrawing

her appearance and striking her as counsel of record for Respondent in this case and removing her from all distribution lists.

8. Respondent has granted its informed consent to the relief requested herein.
9. This withdrawal of counsel will not cause any delay in this matter and will not prejudice Respondent or any other party to this lawsuit.

HAYNSWORTH SINKLER BOYD, P.A.

By: Alissa Fleming

Alissa D. Fleming, Esq.

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*Former Counsel for Respondent The Medical  
University of South Carolina*

BARNWELL WHALEY PATTERSON &  
HELMS, LLC

By: Alissa Fleming for and with  
the consent  
of John  
Fletcher

M. Dawes Cooke, Jr., Esq.

John W. Fletcher, Esq.

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*Attorneys for Respondent The Medical  
University of South Carolina*

March 6, 2018

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In the Court of Appeals

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In the Court of Common Pleas for the Ninth Circuit

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PROOF OF SERVICE

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I certify that I have served the Motion of Alissa D. Fleming, Esq. to be Relieved as Counsel on the above-referenced Appellant by depositing a copy of it in the United States Mail, postage prepaid, on March 6, 2018, addressed to his attorneys of record:

Robert B. Ransom, Esq.  
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P.O. Box 11067  
Columbia, SC 29211  
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Alex Apostolou, Esq.  
3443 Rivers Avenue  
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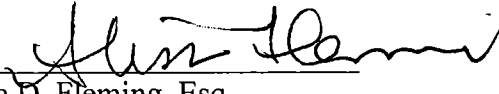
*Attorneys for Appellant Shon Turner, as Personal Representative of the Estate of Charles Mikell, Deceased*

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MAR 08 2018

SC Court of Appeals

HAYNSWORTH SINKLER BOYD, P.A.

By: 

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*Former Counsel for Respondent The Medical  
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March 6, 2018

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

*Re: Shon Turner, as Personal Representative of the Estate of Charles Mikell, Deceased  
(Respondent) v. The Medical University of South Carolina (Appellant);  
Appellate Case No. 2016-002326*

Dear Ms. Kitchings:

Please find enclosed for filing the originals and one copy each of the two Motions to be Relieved as Counsel with Proof of Service (in both the merits and sanctions appeals) in connection with the above-referenced matter. After filing, please return filed-stamped copies to me in the enclosed self-addressed stamped envelope.

If you have any questions, please feel free to contact me.

Sincerely yours,



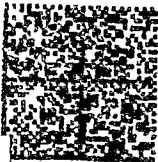
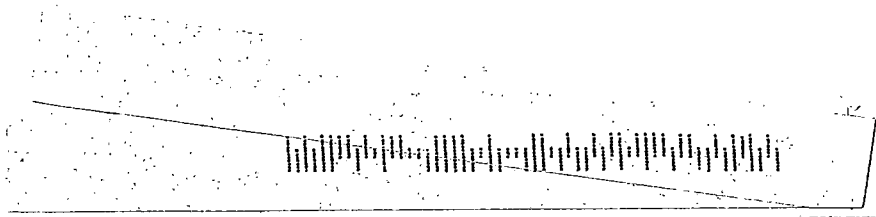
Alissa D. Fleming  
ADF/mec  
Enclosures

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SC Court of Appeals

cc: John W. Fletcher, Esq. (via electronic mail, with enclosures)  
Robert B. Ranson, Esq. (via U.S. Mail, with enclosures)  
Alex Apostolou, Esq. (via U.S. Mail, with enclosures)



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Haynsworth  
Sinkler Boyd, PA

ATTORNEYS AND COUNSELORS AT LAW

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