

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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JUN 29 2018

SC Court of Appeals

APPEAL FROM CHEROKEE COUNTY
Court of Common Pleas

J. Mark Hayes, II, Circuit Court Judge

Case No. 2015-CP-11-0828
Appellate Case No. 2017-001466

Sharon Brown,

Appellant,

v.

Cherokee County School District,

Respondent.

MOTION TO BE RELIEVED AS COUNSEL

Brittany M. Lozanne hereby moves this Court for an Order relieving her as counsel of record and allowing her to withdraw as counsel for the Respondent, Cherokee County School District ("Respondent"), in the above-referenced matter. Rule 264(b), SCACR, permits counsel of record to be relieved and withdrawn as counsel of record for "justifiable cause. . . after proper written notice to [her] client. . . and by written order of the appellate court, and with notice to the adverse party."

Counsel would show unto the Court that she is no longer employed with White & Story, LLC, and that the Respondent has received proper notice of her withdrawal as counsel of record. Respondent will remain represented by other counsel of record, Andrea White, Esq., and would ask the Court to consider her discontinued employment with remaining counsel of record's firm,

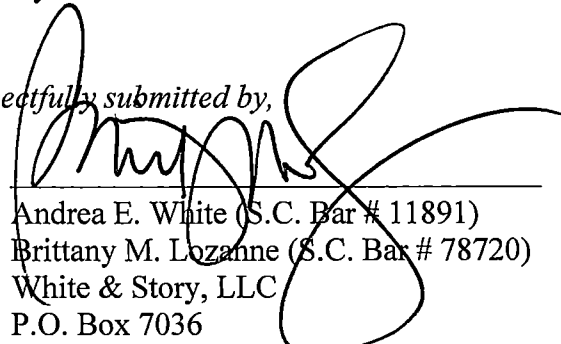
White & Story, LLC, as “justifiable cause” to grant her motion to be relieved and withdrawn as counsel of record.

Further, pursuant to Rule 1.16(b)(5), RPC, Rule 407, SCACR, “a lawyer may withdraw from representing a client if: (1) withdrawal can be accomplished without material adverse effect on the interests of the client; . . .” Counsel would show unto this Court that by the Court granting this motion, Respondent’s interests will not be adversely affected because there is no change to Respondent’s remaining co-counsel of record and at no time as a result of this motion will Respondent be without counsel.

WHEREFORE, for the reasons set for above, Brittany M. Lozanne moves for this honorable Court for an Order:

- a. Relieving and permitting the withdrawal of Brittany M. Lozanne as counsel of record for Respondent Cherokee County School District.

Respectfully submitted by,



Andrea E. White (S.C. Bar # 11891)
Brittany M. Lozanne (S.C. Bar # 78720)
White & Story, LLC
P.O. Box 7036
Columbia, South Carolina 29202
Telephone: 803.814.0993
Facsimile: 803.814.1183

Attorneys for Respondent Cherokee County
School District

June 29, 2018
Columbia, South Carolina

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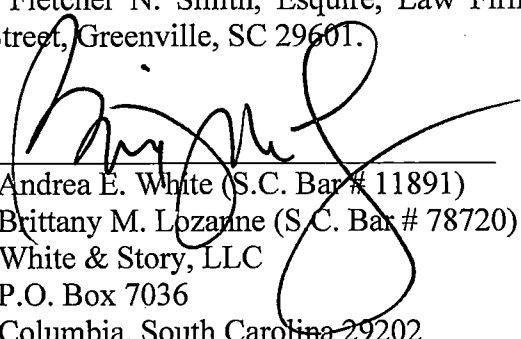
v.

Cherokee County School District,

Respondent.

CERTIFICATE OF SERVICE

I certify that I have served Appellant, *Respondent's Motion to be Relieved as Counsel*, by depositing a copy in the United States Mail, postage prepaid, on June 29, 2018, addressed to her attorney of record, Fletcher N. Smith, Esquire, Law Firm of Fletcher N. Smith, Jr., LLC, 112 Wakefield Street, Greenville, SC 29601.



Andrea E. White (S.C. Bar # 11891)
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CERTIFICATE OF COUNSEL

This is to certify that Respondent Cherokee County School District's
Amended Final Brief complies with Rule 211(b), SCACR.


Andrea E. White (S.C. Bar # 11891)
Brittany M. Lozanne (S.C. Bar # 78720)
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Attorneys for Respondent Cherokee County
School District

June 29, 2018
Columbia, South Carolina

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June 29, 2018

Via Courier

The Honorable V. Claire Allen
Deputy Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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SC Court of Appeals

**Re: Sharon Brown v. Cherokee County School District
C.A. No. 2015-CP-11-0828/ Appellate Case No. 2017-001466**

Dear Ms. Allen:

In response to your letter dated June 20, 2018, regarding the above-referenced matter, please find the following:

- 1) One (1) original and one (1) copy of *Respondent's (corrected) Certificate of Counsel for Respondent's Amended Final Brief*;
- 2) One (1) original and six (6) copies of *Respondent's Motion to be Relieved as Counsel*;
- 3) One (1) original and six (6) copies of *Respondent's Proof of Service*;
- 4) A check for the filing fee in the amount of \$25.00

Pursuant to Rule, 240(b) Respondent recognizes the ten (10) day time limit to cure its deficiencies and further understands that the time limit is automatically stayed upon filing of the enclosed motion to relieve. Should the Court grant the Respondent's Motion to Relieve Counsel, all deficiencies in Respondent's Final Amended Brief should be fully cured.

If this meets with your approval, please return one (1) clocked copy of each document to our courier. Should you have any questions please feel free to contact our office.

Thank you for your assistance in this matter.

Sincere regards,

A handwritten signature in black ink that reads 'Mendy M. Young'. The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Mendy M. Young
Litigation Paralegal

/mmy

Enclosures

c: Fletcher N. Smith, Esquire (w/enclosures)