

STATE OF SOUTH CAROLINA

In the Supreme Court

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**RECEIVED**

JUL 10 2018

APPEAL FROM RICHLAND COUNTY  
Administrative Law Court

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S.C. SUPREME COURT

Appellate Case No. 2018-001225

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Nicholas Geer,

RESPONDENT,

v.

S.C. Department of Probation, Parole  
and Pardon Services,

PETITIONER.


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**MOTION TO WITHDRAW**

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Please allow this to serve as notice to the Court and all parties that Zoe Jones is leaving the law firm of Wilmer Cutler Pickering Hale and Dorr LLP and on August 20, 2018 will be starting a federal judicial clerkship with the Honorable Amy St. Eve of the United States Court of Appeals for the Seventh Circuit. Thus, Ms. Jones will no longer be able to engage in the private practice of law. Therefore, the undersigned moves to withdraw as counsel of record in the above-captioned case, Nicholas Geer v. SCDPPPS. Ms. Jones respectfully requests that the Court grant this motion prior to August 3, 2018. Mr. Geer will remain represented by counsel of record, Lindsey Vann of Justice 360. Mr. Geer has been notified in writing of the termination of Ms. Jones' and WilmerHale's representation and has received a copy of this motion.

Respectfully submitted,

By: 

**ZOE JONES**  
WilmerHale LLP  
1875 Pennsylvania Ave. NW  
Washington, DC 20026  
(202) 663-6969  
zoe.jones@wilmerhale.com

July 5, 2018

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**CERTIFICATE OF SERVICE**

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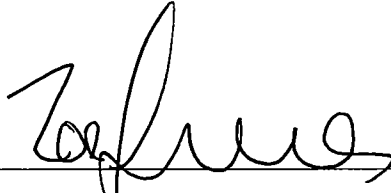
The undersigned certifies that a copy of the Motion to Withdraw was mailed today, July 5, 2018, by first class United States mail to the following:

Lindsey Vann  
Emily Paavola  
Justice 360  
900 Elmwood Ave. Ste 200  
Columbia, SC 29201

Tommy Evans Jr.  
S.C. Department of Probation, Parole and Pardon Services  
P.O. Box 50666  
Columbia, SC 29250

Nicholas M. Geer  
SCDC # 00227443, Q4B-116  
Perry Correctional Institution  
430 Oaklawn Road  
Pelzer, SC 29669

By: \_\_\_\_\_

A handwritten signature in black ink, appearing to read 'Zoe Jones', written over a horizontal line.

**ZOE JONES**  
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July 5, 2018