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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM PICKENS COUNTY  
Edward W. Miller, Circuit Court Judge

Appellate Case No. 2018-001423  
Case No. 2017-CP-39-0428

**RECEIVED**  
AUG 27 2018  
SC Court of Appeals

John M. Burgess, ..... Appellant,

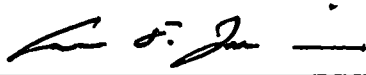
v.

Katherine C. Hunter, ..... Respondent.

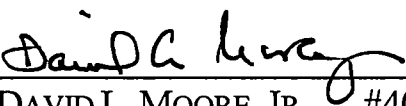
**CONSENT MOTION FOR  
SUBSTITUTION OF COUNSEL**

Counsel for the Respondent Katherine C. Hunter moves the South Carolina Court of Appeals for an order substituting the law firm of Lindemann, Davis & Hughes, P.A., by and through Andrew F. Lindemann, as counsel of record for the Respondent Katherine C. Hunter. David L. Moore, Jr. and the law firm of Turner Padgett Graham & Laney, P.A. requests to be relieved of any obligation to proceed further in representation of the Respondent in this matter.

LINDEMANN, DAVIS & HUGHES, P.A.

BY:   
ANDREW F. LINDEMANN #13030  
5 Calendar Court, Suite 202  
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Columbia, South Carolina 29260  
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TURNER PADGET GRAHAM & LANEY, P.A.

BY:   
DAVID L. MOORE, JR. #4050  
200 East Broad Street, Suite 250  
Post Office Box 1509  
Greenville, South Carolina 29602  
(864) 552-4600  
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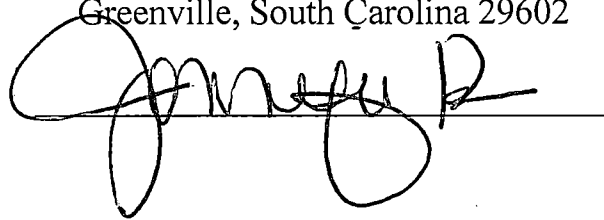
**CERTIFICATE OF SERVICE**

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The undersigned employee of Lindemann, Davis & Hughes, P.A., counsel for the Respondent, does hereby certify that service of the **Consent Motion for Substitution of Counsel** was made upon all counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelopes this the 27th day of August 2018:

Stephen N. Garcia, Esquire  
Garcia Law, LLC  
604 Pettigru Street  
Greenville, South Carolina 29601

David L. Moore, Jr., Esquire  
Turner Padgett Graham & Laney, P.A.  
Post Office Box 1509  
Greenville, South Carolina 29602



A handwritten signature in black ink, appearing to read "David L. Moore, Jr.", is written over a horizontal line.

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# LINDEMANN, DAVIS & HUGHES, P.A.

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Attorneys at Law

Andrew F. Lindemann\*  
James M. Davis, Jr.†  
Joel S. Hughes†

5 Calendar Court, Suite 202  
Post Office Box 6923  
Columbia, South Carolina 29260

Telephone (803) 881-8920  
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\*Also admitted in North Carolina  
†Certified Mediator

Direct Dial (803) 881-8921  
Email: [andrew@ldh-law.com](mailto:andrew@ldh-law.com)

August 27, 2018

**Hand Delivered**

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

RE: John M. Burgess v. Katherine Hunter  
Appellate Case Number: 2018-001423  
Civil Action Number: 2017-CP-39-0428  
Claim Number: 21379503  
Our File Number: 307.20053

Dear Ms. Kitchings:

Please find enclosed the original and seven copies of the **Consent Motion for Substitution of Counsel** in the above referenced matter. I would appreciate you filing the original motion and returning a clocked-in copy to me by way of my paralegal. I have also enclosed my firm's \$25.00 check for the filing fee.

By copy of this letter, I am serving copies on all counsel of record. If you have any questions, please advise.

Sincerely,

LINDEMANN, DAVIS & HUGHES, P.A.



Andrew F. Lindemann

AFL/jmb  
Enclosures

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
August 27, 2018  
Page Two

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cc: (w/ Enclosure)

Stephen N. Garcia, Esquire  
Garcia Law, LLC  
604 Pettigru Street  
Greenville, South Carolina 29601

David L. Moore, Jr., Esquire  
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