



O'Shea  
Law Firm  
— LLC —

Ian Richard O'Shea, Esq.\*  
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\*licensed in SC & NY

1120 Folly Road  
Charleston, SC 29412  
Telephone: 843-805-4943  
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January 7, 2019

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

**RECEIVED**  
JAN 09 2019  
SC Court of Appeals

Re: South Carolina Human Affairs Commission v. Zeyi Chen & Zhirong Yang  
Civil Action No.: 2014-CP-10-7037  
Appellate Case No.: 2018-001879

Dear Ms. Kitchings:

Please find enclosed the updated proof of service of the Respondents' Petition for Leave to Withdraw as Counsel and Incorporated Memorandum in Support. The Respondents were served with the Petition by mail and were sent a copy via email on December 19, 2018 although they were not included in the certificate of service filed with the Court. Please also find enclosed the document signed by both Respondents as you requested. Thank you for your assistance with this matter.

With kind regards, I am,

Sincerely,

*Brooklyn O'Shea*

Brooklyn A. O'Shea

Enclosure

cc: Karl Smith Bowers, Jr., Esquire  
R. Alexander Pate, II, Esquire  
Lee Ann Rice, Esquire  
Zeyi Chen  
Zhirong Yang

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge  
J.C. Nicholson, Jr., Circuit Court Judge

Case No. 2018-CP-001879

South Carolina Human Affairs  
Commission

Appellant,

v.

Zeyi Chen & Zhirong Yang,

Respondents.

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CERTIFICATE OF SERVICE

I hereby certify that on the 19<sup>th</sup> day of December, 2018, in Charleston, SC, I served a copy of the **Petition for Leave to Withdraw as Counsel for Respondents and Incorporated Memorandum in Support** upon Counsel for Appellant and the Respondents by depositing the same in the United States Mail, postage prepaid, and addressed as follows:

Mr. Karl Smith Bowers, Jr., Esquire  
Bowers Law Office, LLC  
Post Office Box 50549  
Columbia, SC 29250

Mr. Randy Alexander Pate, II, Esquire  
1026 Sumter Street, Ste. 101  
Columbia, SC 29201

Mrs. Lee Ann Rice, Esquire  
1026 Sumter Street, Ste. 101  
Columbia, SC 29201

Mr. Zeyi Chen  
30 Colleton Drive  
Charleston, SC 29407

Mrs. Zhirong Yang  
30 Colleton Drive  
Charleston, SC 29407

Brooklyn O'Shea  
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Re: SCHAC v. Zeyi Chen & Zhirong Yang 2018-001879

I would like to proceed *pro se* (without a lawyer) in the above referenced appeal. I understand that O'Shea Law Firm, LLC does not represent me in the above referenced appeal. I acknowledge that I have received a copy of my file.

Zeyi Chen

1-5-19

Date

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SC Court of Appeals

Zhirong Yang

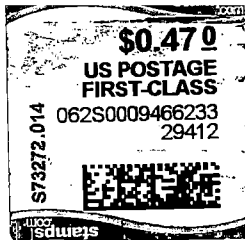
1-5-19

Date



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Charleston, SC 29412

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