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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

APPEAL FROM CHARLESTON COUNTY  
The Honorable R. Markley Dennis, Jr., Circuit Court Judge FEB 06 2019

**SC Court of Appeals**

Appellate Case No. 2018-001766  
Circuit Court Case No. 2015-CP-10-05415

Charleston Development Company, LLC, Charleston Housing Company, LLCC and NotSo Hostel, LLC, Appellants,

v.

Younesse Alami, Simon M. Adell, Matthew Anderson, Matthew Asher, Daniel Baker, Marie Baker, Matthew and Christina Bare, Andre Bauer, Peter Bierce, Brandon Blount, Barbara Brass, Richard T. Brewer, Sigrid Anne Eilertson, Reginald P. Brown IV, Mary Cahill, Ryan Cockrell, Kevin and Virginia Conlon, Anne Marie Crevar, Christina Cross, Darryl J. Damico, Labar Daniel, Stephen Darwak, Lindsay Davenport, Mary Dickerson, Maxwell Streeter, Kathleen Dougherty, David Dressman, Anna Dressman, Michael Elder, Christopher Scott Farley, Michele Ghastin, Timnah Giller, Virginia Geller, Ryan Gilreath, Sonya Gilreath, Kimberly Glenn, Shaun Halsor, Josephine Rex, Arthur Halvorson, Andrew Halvorson, Linda Hancock, Laura Hyatt, Mike Hartel, Nathan Herring, James Hicks, Jr., Laurie Hicks, Preston G. Hipp, Colin Jones, Matthew F. Jones, Robert C. Jones, Robin Joseph, Molly Keeler, John Kenny, Mandi Walters, Abigail King, Aaron Kless, Laurie Kramer, Robert Kramer, Allison Kreutzer, Benjamin Levitt, Richard Levitt, Jesse Lutz, Nikou Manouchehri, Thomas Naselaris, Zoe Naselaris, Beau O'Steen, Cori O'Steen, Lance Parr, Brandon Perdue, Amanda Lee Raymer, Hadassah Rothenberg, Daniel Ryan, Kimberly Bowlin, Kevin Schnittker, Ginger Scofield, Inderjit Singh, Avtar Singh, Alecia Stevens, Lee Stevens, Justin Swan, Merrick Teichman, John Van Vlack, Jr., William Waterhouse, Jennifer Waterhouse, Anne Wohlfeil, Bryan Young, AJB Trust, Anthony & Jacqueline Bradley, Trustees, Hartshorn Family Trust, Helene Kenny / Bridget Denny Revocable Trust, Wilhelmina M. Wieters Life Estate Childrens Trust, 33 Bogard Street LLC, 249 Cumming, LLC, 253 Coming Street LLC, 259 East Bay LLC, 259 East Bay 10 B LLC, 272 D Coming St. LLC, Cafe International, Inc., Comer At Old Canton, LLC, Geer Interests LLC, Kit Properties LLC, Lambert-Weiss LLC, The Naws LLC, New Lease Capital LLC, One Henrietta LLC, Periwinkle Partners, LLC, Porch Properties LLC, Westbury Properties, LLC, and Westendorff Hardware LLC, Defendants,

Of whom Younesse Alami, Simon M. Adell, Matthew Anderson, Matthew Asher, Andre Bauer, Peter Bierce, Brandon Blount, Reginald P. Brown IV, Mary Cahill, Ryan Cockrell, Kevin and Virginia Conlon, Anne Marie Crevar, Darryl J. Damico, Stephen Darwak, Lindsay Davenport, Kathleen Dougherty, David Dressman, Anna Dressman, Michael Elder, Christopher Scott Farley, Michele Ghastin, Ryan Gilreath, Sonya Gilreath, Shaun Halsor, Josephine Rex, Laura Hyatt, Nathan Herring, James Hicks, Jr., Laurie Hicks, Preston G. Hipp, Colin Jones, Matthew F. Jones,

Robert C. Jones, Robin Joseph, Molly Keeler, John Kenny, Abigail King, Aaron Kless, Laurie Kramer, Rooeff Kramer, Allison Kreutzer, Jesse Lutz, Thomas Naselaris, Zoe Naselaris, Beau O'Steen, Cori O'Steen, Lance Parr, Brandon Perdue, Hadassah Rothenberg, Daniel Ryan, Kimberly Bowlin, Kevin Schnittker, Ginger Scofield, Alecia Stevens, Justin Swan, Merrick Teichman, John Van Vlack, Jr., William Waterhouse, Jennifer Waterhouse, Anne Wohlfeil, Bryan Young, Hel\_ene Kenny / Bridget Denny Revocable Trust, 259 East Bay LLC, 259 East Bay 10 B LLC, Comer At Old Canton, LLC, Kit Properties LLC, The Naws LLC, One Henrietta LLC, Periwinkle Partners, LLC, Porch Properties LLC, Westbury Properties, LLC, and Westendorff Hardware LLC, are the Respondents.

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**MOTION TO BE RELIEVED OF COUNSEL FOR  
DEFENDANTS BEAU AND CORI O'STEEN  
FILED WITH THE CONSENT OF THE DEFENDANTS BEAU AND CORI O'STEEN**

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COME NOW Thomas J. Rode and Michael A. Timbes of the law firm of Thurmond Kirchner & Timbes, PA, respectfully move before the Honorable Court to enter an Order relieving them AND Thurmond Kircher & Timbes, PA, as counsel of record for Defendants Beau and Cori O'Steen and shows as follows:

1. THAT Defendants, by their signatures below, herein consent to the instant motion and no longer wish to employ the services of their counsel and request the same to be relieved; and
2. THAT unless and until an appearance is made by counsel Defendants Beau and Cori O'Steen shall be *pro se* and their address for service shall be:

**5362 Farmstead Drive, Aiken, South Carolina 29803.**

For and upon the good cause shown below, the undersigned parties herein respectfully request this Honorable Court issue an order relieving counsel.

[signature page to follow]

**I SO MOVE:**

THURMOND KIRCHNER & TIMBES, P.A.



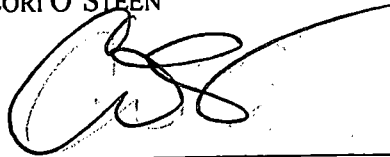
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Thomas J. Rode  
Michael A. Timbes  
15 Middle Atlantic Wharf  
Charleston, South Carolina 29401  
843-937-8000 (office)  
[thomas@tktlawyers.com](mailto:thomas@tktlawyers.com)  
[michael@tktlawyers.com](mailto:michael@tktlawyers.com)

*Attorneys for Defendants Beau & Cori O'Steen*

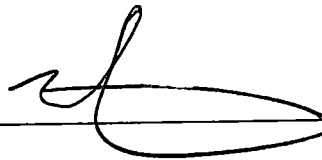
**I SO MOVE AND CONSENT:**

CORI O'STEEN



**I SO MOVE AND CONSENT:**

BEAU O'STEEN



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v.

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Of whom Younesse Alami, Simon M. Adell, Matthew Anderson, Matthew Asher, Andre Bauer, Peter Bierce, Brandon Blount, Reginald P. Brown IV, Mary Cahill, Ryan Cockrell, Kevin and Virginia Conlon, Anne Marie Crevar, Darryl J. Damico, Stephen Darwak, Lindsay Davenport, Kathleen Dougherty, David Dressman, Anna Dressman, Michael

Elder, Christopher Scott Farley, Michele Ghastin, Ryan Gilreath, Sonya Gilreath, Shaun Halsor, Josephine Rex, Laura Hyatt, Nathan Herring, James Hicks, Jr., Laurie Hicks, Preston G. Hipp, Colin Jones, Matthew F. Jones, Robert C. Jones, Robin Joseph, Molly Keeler, John Kenny, Abigail King, Aaron Kless, Laurie Kramer, Rooeff Kramer, Allison Kreutzer, Jesse Lutz, Thomas Naselaris, Zoe Naselaris, Beau O'Steen, Cori O'Steen, Lance Parr, Brandon Perdue, Hadassah Rothenberg, Daniel Ryan, Kimberly Bowlin, Kevin Schnittker, Ginger Scofield, Alecia Stevens, Justin Swan, Merrick Teichman, John Van Vlack, Jr., William Waterhouse, Jennifer Waterhouse, Anne Wohlfeil, Bryan Young, Helene Kenny / Bridget Denny Revocable Trust, 259 East Bay LLC, 259 East Bay 10 B LLC, Comer At Old Canton, LLC, Kit Properties LLC, The Naws LLC, One Henrietta LLC, Periwinkle Partners, LLC, Porch Properties LLC, Westbury Properties, LLC, and Westendorff Hardware LLC, are.....Respondents.

**PROOF OF SERVICE**

I, Caroline E. Boyce, an employee of Thurmond Kirchner & Timbes, P.A., attorneys for Defendants Beau and Cori O'Steen, do hereby certify that I have on this date, delivered via U.S. Mail, a true and correct copy of the Consent Motion to be Relieved as Counsel to the following counsel of record:

<p>Sean K. Trundy, Esquire          Sean Kevin Trundy, LLC          1212 Wappoo Rd.          Charleston, SC 29407  <a href="mailto:strundy@trundylawfirm.com">strundy@trundylawfirm.com</a>  <i>Attorney for Appellants</i></p>	<p>Gregory Voigt, Esquire          Voigt Murphy          815 Savannah Highway, Suite 201B          Charleston, SC 29407  <i>Attorneys for 259 East Bay LLC, 259 East Bay 10 B LLC, Robert C. Jones, Matthew F. Jones, Daniel Ryan, Kimberly Bowlin</i></p>
<p>Daniel C. Boles, Esquire          Boles Law Finn, LLC          Post Office Box 381          Charleston, SC 29402  <a href="mailto:dan@boleslawfirm.com">dan@boleslawfirm.com</a>  <i>Attorneys for Abigail King, KIT Properties, LLC</i></p>	<p>Mallary L. Scheer, Esquire          Attorney at Law, LLC          49 Elizabeth Street          Charleston, SC 29403  <a href="mailto:mallarv@mscheerlaw.com">mallarv@mscheerlaw.com</a>  <i>Attorneys for Reginald P. Brown, IV</i></p>

<p>Michael Whitsitt, Esquire  1476 Ben Sawyer Blvd, Ste 3  Mount Pleasant, SC 29464  <a href="mailto:mawhitsitt@gmail.com">mawhitsitt@gmail.com</a>  <i>Attorneys for Merrick Teichmann</i></p>	<p>Stafford J. McQuillan, III Esquire  Haynsworth Sinkler Boyd  Post Office Box 340  Charleston, SC 29402  <a href="mailto:mmcouillin@hsblawfirm.com">mmcouillin@hsblawfirm.com</a>  <i>Attorneys for William and Jennifer Waterhouse</i></p>
<p>David Marvel, Esquire  Post Office Box 22734  Charleston, SC 29413  <a href="mailto:dave@marvellawyer.com">dave@marvellawyer.com</a>  <i>Attorneys for Matthew Asher, Anne Marie Crevar, Stephen Darwak, Ann Wohlfeil</i></p>	<p>Christopher Murphy, Esquire  Murphy Law Offices, LLC  Post Office Box 2008  Mount Pleasant, SC 29465  <a href="mailto:chris@chrismurphylaw.com">chris@chrismurphylaw.com</a>  <i>Attorneys for Younesse Alami, Mary Cahill, Darryl J Damico, Lindsay Davenport, David &amp; Anna Dressman, Christopher Scott Farley, Michele Ghastin, Shaun Halsor &amp; Josephine Rex, Nathan Herring, James Jr &amp; Laurie Hicks, Colin Jones, John Kenny &amp; Mandi Walters, Aaron KJess, Thomas &amp; Zoe Naselaris, Lance Parr, Justin Swan, John Van Vlack, Jr., Andre Bauer, Westbury Properties, LLC, 249 Cumming, LLC, Corner At Old Canton, LLC, Periwinkle Partners, LLC</i></p>

<p>Mary Lee Briggs, Esquire  Inglese &amp; Associates LLC  105 Wappoo Creek Drive, Suite 1-A  Charleston, SC 29412  chris@incrlseandassociates.com</p> <p>-and-</p> <p>Nancy Bloodgood, Esquire  Bloodgood &amp; Sanders, LLC  254 Mathis Ferry Rd. Ste. 201  Mt. Pleasant, SC 29464  lsanders@bloodgoodsanders.com  <i>Attorneys for Simon M. Adell, Matthew Anderson, Peter Bierce, Brandon Blount, Ryan Cockrell, Kevin &amp; Virginia Conlon, Kathleen Dougherty, Michael Elder, Ryan and Sonya Gilreath, Hartshorn Family Trust, Preston G Hipp, Robin Joseph, Molly Keeler, Helene Kenny/ Bridget Kenny Revocable Trust, One Henrietta LLC, Brandon Perdue, Hadassah Rothenberg, Kevin Schnittker, Ginger Scofield, Bryan Young, The Naws, LLC, Westendorff Hardware LLC</i></p>	<p>Allison Kreutzer  11 Carondelet St.  Charleston, SC 29403  <i>PRO SE</i></p> <p>Robert and Laurie Kramer  11 Gadsden Street  Charleston, SC 29401  <i>PRO SE</i></p>

*Caroline E. Boyce*  


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Caroline E. Boyce  
Paralegal to Thomas J. Rode

This 4 day of February, 2019  
Charleston, South Carolina

**THURMOND KIRCHNER**  
 **& TIMBES, P.A.**  
ATTORNEYS AT LAW

15 Middle Atlantic Wharf  
Charleston, SC 29401  
o: 843.937.8000  
f: 843.937.4200  
www.TKTLawyers.com

January 30, 2019

**VIA US MAIL & FAX**

The Hon. Jenny A. Kitchings  
S.C. Court of Appeals  
PO Box 11629  
Columbia, SC 29211  
803-734-1839

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FEB 06 2019  
SC Court of Appeals

**Re: *Charleston Development Company, LLC v. Alami et al.***

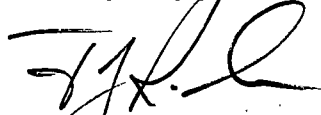
Dear Mrs. Kitchings,

Enclosed for filing please find an original and seven copies of the Motion of Cori and Beau O'Steen's to Relieve Counsel and Proceed *pro se*, together with a check for the required \$50.00 filing fee. Please return one file stamped copy to my office in the enclosed self-addressed stamped envelope.

By copy of this letter I am serving all counsel of record with the same.

With best regards, I remain

Very truly yours,



Thomas J. Rode  
[thomas@tktlawyers.com](mailto:thomas@tktlawyers.com)

TJR

Enc: Filing Fee  
Motion (original plus 7 copies)

Cc: All counsel of Record

FIRST-CLASS



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FEB 04 2019

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THURMOND KIRCHNER



& TIMBES, P.A.

ATTORNEYS AT LAW

15 Middle Atlantic Wharf  
Charleston, South Carolina 29401

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