

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Ralph King Anderson, III  
Administrative Law Judge

Case No. 2017-002598

**RECEIVED**  
FEB 25 2019  
SC Court of Appeals

CHARLES S. BLACKMON AND SOUTH CAROLINIANS FOR RESPONSIBLE  
AGRICULTURAL PRACTICES, ..... APPELLANTS,

v.

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL,  
AND DAVID COGGINS BROILERS, ..... RESPONDENTS,

CHARLES S. BLACKMON AND SOUTH CAROLINIANS FOR RESPONSIBLE  
AGRICULTURAL PRACTICES, ..... APPELLANTS,

v.

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL,  
AND HEATH COGGINS BROILERS, ..... RESPONDENTS,

CHARLES S. BLACKMON AND SOUTH CAROLINIANS FOR RESPONSIBLE  
AGRICULTURAL PRACTICES, ..... APPELLANTS,

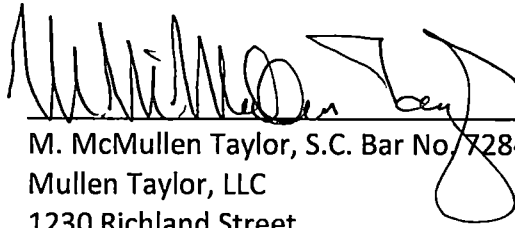
v.

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL,  
AND JIM YOUNG BROILERS, ..... RESPONDENTS.

**APPELLANTS' MOTION TO WITHDRAW ATTORNEY AS COUNSEL OF RECORD**

Pursuant to Rule 240 and 264(b), SCACP, Appellants hereby move to withdraw M. McMullen Taylor as counsel of record for Appellants. Appellants' consent to Ms. Taylor's withdrawal is evidenced by the attached correspondence. Robert Guild will continue to serve as counsel of record for Appellants.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "M. McMullen Taylor", written over a horizontal line.

M. McMullen Taylor, S.C. Bar No. 72848  
Mullen Taylor, LLC  
1230 Richland Street  
Columbia, South Carolina 29201  
(803) 254-1344

Robert Guild, S.C. Bar No. 2358  
314 Pall Mall Street  
Columbia, South Carolina 29201  
(803) 917-5738  
[bguild@mindspring.com](mailto:bguild@mindspring.com)

*Counsel for Appellants*

February 25, 2019  
Columbia, South Carolina

## Mullen Taylor

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**From:** CharlesSBlackmon <charlessblackmon@bellsouth.net>  
**Sent:** Thursday, February 21, 2019 3:56 PM  
**To:** Mullen Taylor  
**Subject:** RE: Blackmon and SCRAP v. David Coggins, Heath Coggins & Jim Young, Case # 2017-002598

Mullen,

Thank you for your telephone call today. I regret that circumstances dictate your request for consent to withdraw. I consent individually and on behalf of SCRAP for you to withdraw as counsel of record in the appeal pending before the SC Court of Appeals.

It has been a pleasure working with you as you represented SCRAP in the action. I wish you the best in the future.

Sincerely,  
Charles Blackmon  
SCRAP, President

Sent from [Mail](#) for Windows 10

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**From:** [Mullen Taylor](#)  
**Sent:** Thursday, February 21, 2019 2:08 PM  
**To:** 'CharlesSBlackmon'  
**Cc:** 'Bob Guild'  
**Subject:** Blackmon and SCRAP v. David Coggins, Heath Coggins & Jim Young, Case # 2017-002598

Charles,

To follow up from our phone conversation, I ask for the consent of you individually and on behalf of SCRAP for my withdrawal as counsel of record for you and SCRAP in the appeal pending before the Court of Appeals. Please reply to this email stating your consent to my withdrawal on behalf of SCRAP and your individual consent. I will attach this email to a motion to withdraw that I will file next week with the Court.

It has been an honor and pleasure representing you and SCRAP in this matter. I wish you well in this appeal.

Best,

Mullen



**M. McMullen Taylor**  
Post Office Box 8567  
Columbia, South Carolina 29202  
(Physical address: 1230 Richland Street 29201)

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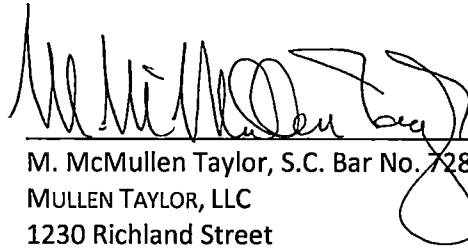
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL,  
AND JIM YOUNG BROILERS, ..... RESPONDENTS.

**CERTIFICATE OF SERVICE**

I hereby certify that, on February 25, 2019, I served Appellants' Motion to Withdraw Attorney as Counsel of Record upon Respondents by placing copies of same in the United States Postal Service addressed to:

Benjamin P. Mustian, Esq.  
Mitchell Willoughby, Esq.  
Tracey C. Green, Esq.  
WILLOUGHBY & HOEFER, P.A.  
Post Office Box 8416  
Columbia, South Carolina 29202-8416

Stephen P. Hightower, Esq.  
S.C. Dept. of Health and Environmental Control  
Office of General Counsel  
2600 Bull Street  
Columbia, South Carolina 29201

A handwritten signature in black ink, appearing to read "M. McMullen Taylor", is written over a horizontal line.

M. McMullen Taylor, S.C. Bar No. 72848  
MULLEN TAYLOR, LLC  
1230 Richland Street  
Columbia, South Carolina 29201  
(803) 254-1344

*Attorney for Appellants*

February 25, 2019

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

**RECEIVED**

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SC Court of Appeals

RE: Charles S. Blackmon et al. v. SCDHEC et al.  
Appellate Case Number 2017-002598

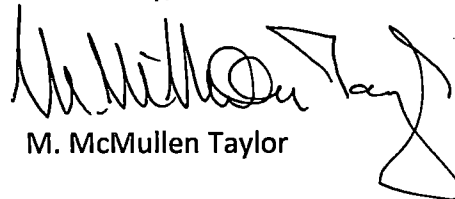
Dear Ms. Kitchings:

Enclosed please find an original and seven copies of Appellants' Motion to Withdraw Attorney as Counsel of Record, along with a certificate of service and check for the filing fee. Please file-stamp the extra copy and return to me.

By copy of this letter, counsel of record are hereby served with this Motion.

Thank you for your assistance.

Yours truly,

  
M. McMullen Taylor

Enclosures

cc: Robert Guild, Esq.  
Stephen P. Hightower, Esq.  
Benjamin P. Mustian, Esq.  
Tracey C. Green, Esq.  
Mitchell Willoughby, Esq.