

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

Appellate Case No. 2018-001879

RECEIVED
MAY 17 2019
SC Court of Appeals

South Carolina Human Affairs Commission,

Appellant,


v.

Zeyi Chen & Zhirong Yang,

Respondents.

MOTION TO RELIEVE COUNSEL

Pursuant to South Carolina Appellate Court Rule 240, Appellant requests Joshua Barr be relieved as counsel. Mr. Barr worked for the Appellant in 2014 when the original suit was filed but left the agency in 2015 to practice in Iowa. Mr. Barr has consented to his removal (see attached email) and for the Appellant to seek the same on his behalf.



R. Alexander Pate, II
Lee Ann Rice
South Carolina Human Affairs Commission
1026 Sumter Street, Suite 101
Columbia, South Carolina 29201
rpate@schac.sc.gov
larice@schac.sc.gov
(803) 737-7800

Karl S. Bowers, Jr.
Bowers Law Office, LLC
Post Office Box 50549
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(803) 753-1099
Attorneys for Appellant

Pate, Alex

From: Barr, Joshua V. <JV Barr@dmgov.org>
Sent: Thursday, May 16, 2019 9:22 AM
To: Wooten Rice, Lee Ann
Cc: Pate, Alex
Subject: [External] RE: Woods Appeal

Hello Lee Ann,

How are you? Des Moines has no ocean and no mountains so it's no South Carolina but it puts food on the table. How's life in SC and at SCHAC?

Yes, I still receive the notices for the Woods case. When I saw Marvin in November I told him that I was surprised to see that the case was ongoing. It would be great to have my name removed. Whatever is more convenient for you all I am fine with.

Thanks for reaching out and I hope all is well.

Joshua V. Barr, Esq.

Director
Civil & Human Rights Commission
City of Des Moines
602 Robert D. Ray Drive
Des Moines, Iowa 50309
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Fax: 515-237-1408
humanrights@dmgov.org
www.humanrightsDSM.org

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From: Wooten Rice, Lee Ann [mailto:larice@schac.sc.gov]
Sent: Wednesday, May 15, 2019 3:53 PM
To: Barr, Joshua V. <JV Barr@dmgov.org>
Cc: Pate, Alex <rpate@schac.sc.gov>
Subject: Woods Appeal

Hey there Joshua! I hope you're doing great in Des Moines! We are trucking along in Columbia pretty well.

Marvin mentioned that you'd like to be removed from the SCHAC/Chen/Woods appeal. We'd be happy to send over a Motion to be Relieved as Counsel if you wanted to sign it and we can send it over on your behalf. We could even sign it on your behalf, if that's what you prefer. Just let me know the best route moving forward.

Thanks a lot and let us know if there's anything else we can help with!

Sincerely,

Lee Ann W. Rice, Esq.
General Counsel
South Carolina Human Affairs Commission
1026 Sumter Street, Suite 101
Columbia, SC 29201
O: 803.737.1131
F: 803.253.4191

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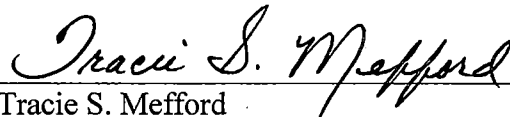
Respondents.

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of May, 2019, in Columbia, South Carolina, I served a copy of the foregoing **Motion to Relieve Counsel** on the Respondents by depositing the same in the United States Mail, postage prepaid, and addressed as follows:

Zeyi Chen
30 Colleton Drive
Charleston, South Carolina 29407

Zhirong Yang
30 Colleton Drive
Charleston, South Carolina 29407



Tracie S. Mefford
South Carolina Human Affairs Commission
1026 Sumter Street, Suite 101
Columbia, South Carolina 29201
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STATE OF SOUTH CAROLINA
HUMAN AFFAIRS COMMISSION



Raymond Buxton, II
Commissioner

1026 Sumter St. #101
Columbia, South Carolina 29201
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Toll Free 1-800 521-0725 (In-State Only)

www.schac.sc.gov

May 17, 2019

RECEIVED

MAY 17 2019

SC Court of Appeals

VIA HAND DELIVERY

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

Re: South Carolina Human Affairs Commission v. Zeyi Chen & Zhirong Yang
Appellate Case No. 2018-001879

Dear Ms. Kitchings:

I am enclosing the original and ten (10) copies of a Motion to Supplement Record on Appeal and Motion to Relieve Counsel in connection with the above referenced matter. Please file these documents and return the extra clocked-in copies to my courier. By copy of this letter I am serving a copy of these Motions upon the Respondents who are Pro Se.

Thank you for your assistance in this matter.

Sincerely,

R. Alexander Pate, II

/tsm

enclosures

c.c. Mr. Zeyi Chen
Ms. Zhirong Yang
Karl Smith Bowers, Jr., Esquire