

890022

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Thomas A. Russo, Circuit Court Judge

Appellate Case No. 2018-002270  
Case No. 2014-CP-26-07790

Richard Ciampanella, .....Respondent,

v.

City of Myrtle Beach, .....Appellant.

**MOTION FOR SUBSTITUTION OF COUNSEL**

Appellant City of Myrtle Beach, by and through its undersigned counsel, hereby moves this Honorable Court for an Order substituting Fred H. Oliver, Esquire of Collins & Lacy, P.C., for William A. Bryan, Jr., Esquire as counsel for Appellant on the grounds that Mr. Bryan is no longer employed with Collins & Lacy, P.C. Amy L. Neuschafer, Esquire also will continue to represent Appellant.

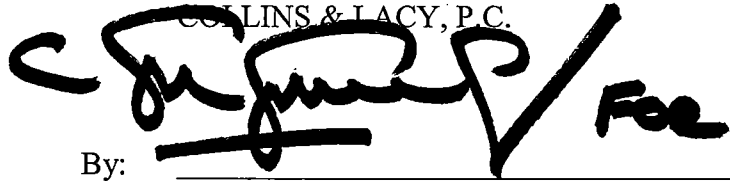
[Signature Page to Follow]

**RECEIVED**

JUN 13 2019

SC Court of Appeals

Respectfully submitted,  
COLLINS & LACY, P.C.

A large, stylized handwritten signature in black ink, appearing to read 'Amy L. Neuschafer', with a checkmark-like flourish at the end.

By: \_\_\_\_\_

Amy L. Neuschafer, Esquire

SC Bar No.: 73922

[aneuschafer@collinsandlacy.com](mailto:aneuschafer@collinsandlacy.com)

Fred H. Oliver, Esquire

SC Bar No.: 100969

[foliver@collinsandlacy.com](mailto:foliver@collinsandlacy.com)

11945 Grandhaven Drive, Suite D

Murrells Inlet, SC 29576

843.353.2350 (p)

843.353.2351 (f)

ATTORNEYS FOR APPELLANT  
CITY OF MYRTLE BEACH

**APPELLANT'S MOTION FOR  
SUBSTITUTION OF COUNSEL**

Murrells Inlet, South Carolina  
June 13, 2019

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Thomas A. Russo, Circuit Court Judge

Appellate Case No. 2018-002270

Richard Ciampanella, .....Respondent,

v.

City of Myrtle Beach, .....Appellant.

**PROOF OF SERVICE**

I certify that I have served Appellant's Motion for Substitution of Counsel by mailing a copy of same to Respondent's attorneys of record in the United States mail, with sufficient postage affixed thereto on the date indicated below.

**COUNSEL SERVED:**

Gene M. Connell, Jr., Esquire  
Kelaher, Connell & Connor, P.C.  
Post Office Drawer 14547  
Surfside Beach, SC 29587

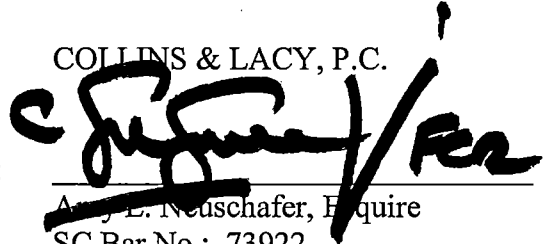
Julian Z. Hanna, Esquire  
Julian Z. Hanna and Associates, P.A.  
14323 Ocean Highway, Suite 4105  
Pawleys Island, SC 29585

**RECEIVED**  
JUN 13 2019  
SC Court of Appeals

[SIGNATURE PAGE TO FOLLOW]

COLLINS & LACY, P.C.

By:

  
Amy L. Neuschafer, Esquire

SC Bar No.: 73922

[aneuschafer@collinsandlacy.com](mailto:aneuschafer@collinsandlacy.com)

Fred H. Oliver, Esquire

SC Bar No.: 100969

[foliver@collinsandlacy.com](mailto:foliver@collinsandlacy.com)

11945 Grandhaven Drive, Suite D

Murrells Inlet, SC 29576

843.353.2350 (p)

843.353.2351 (f)

ATTORNEYS FOR APPELLANT  
CITY OF MYRTLE BEACH

**PROOF OF SERVICE**

Murrells Inlet, South Carolina  
June 13, 2019



Amy L. Neuschafer | D: 843.353.2331 | E: aneuschafer@collinsandlacy.com

June 13, 2019

**VIA HAND DELIVERY**

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

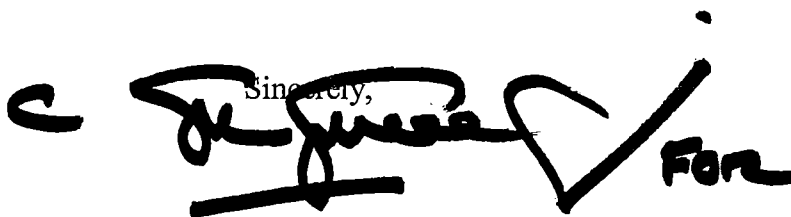
Re: Richard Ciampanella v. City of Myrtle Beach  
Civil Action No. 2014-CP-26-7790  
C&L File No. 000456-01017

Dear Ms. Kitchings:

Enclosed for filing is the original and seven copies of Appellant's Motion for Substitution of Counsel together with Proof of Service. Also included is a check for the filing fee in the amount of \$50.00. Please return a filed copy to me in the self-addressed stamped envelope provided.

If you have any questions or need additional information, please do not hesitate to contact me.

With kind regards,

Sincerely,  
A handwritten signature in black ink, appearing to read "Amy L. Neuschafer". To the right of the signature, the word "For" is written in a similar cursive style.

Amy L. Neuschafer

/acg  
Enclosures

pc: Gene M. Connell, Jr., Esquire  
Julian Z. Hanna, Esquire

**RECEIVED**  
JUN 13 2019  
SC Court of Appeals