

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Hon. Doyet A. Early, Circuit Court Judge

**RECEIVED**  
JUL 12 2019  
SC Court of Appeals

C.A. No.: 2018-CP-40-02425  
Appellate Case No. 2019-000648

Jefferson Davis, Jr.....Appellant,

v.

Ellen Weaver, Tony Denny, Access Opportunity South Carolina, et  
al.....Respondents.

RESPONDENT TONY DENNY'S NOTICE AND MOTION OF TRANSFER  
WITHIN FIRM AND SUBSTITUTION OF COUNSEL

YOU WILL PLEASE TAKE NOTICE that, pursuant to Rule 264, SCRAP, Respondent Tony Denny ("Denny") hereby petitions the South Carolina Court of Appeals for a written order substituting counsel for this matter. The responsibility for the representation of Tony Denny, in the within action has been transferred within the firm of Turner, Padget, Graham & Laney, P.A. from James H. Goldin, Esquire to Alan G. Jones, Esquire. Respondent Denny, by and through the undersigned counsel, request that all future pleadings, motions, submissions, notices and correspondence herein should be directed to the undersigned. Representation of Access Opportunity South Carolina will remain with Mr. Goldin. The client has been provided proper written notice and has consented to the

withdrawal of Mr. Goldin and the substitution of Mr. Jones as shown via Exhibit A, attached.

Respectfully submitted,

Turner Padgett Graham & Laney, P.A.

s/ Alan G. Jones

Alan G. Jones, SC Bar No. 100141

Post Office Box 1509

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Direct: 864-552-4626

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agjones@turnerpadgett.com

Greenville, South Carolina  
July 9, 2019

ATTORNEY FOR TONY DENNY

# Exhibit A

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

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Hon. Doyet A. Early, Circuit Court Judge

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Appellate Case No. 2019-000648

Jefferson Davis, Jr. .... Appellant,

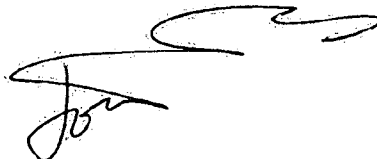
v.

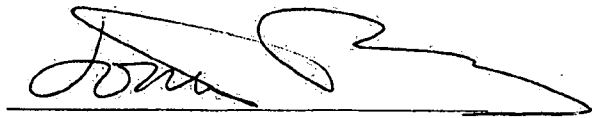
Ellen Weaver, Tony Denny, Access Opportunity South Carolina, et  
al. .... Respondents.

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## NOTICE AND CONSENT AS TO TONY DENNY, INDIVIDUALLY OF TRANSFER WITHIN FIRM AND SUBSTITUTION OF COUNSEL

Pursuant to Rule 264, South Carolina Rules of Appellate Procedure, I Tony Denny hereby consent to the substitution of Alan G. Jones, Esq. for James H. Goldin, Esq. with regard to the above-captioned case, including this appeal, on behalf of Tony Denny, individually, only, with representation for Access Opportunity to remain with Mr. Goldin.



A handwritten signature in black ink, appearing to read "Tony Denny", written over a horizontal line.

Tony Denny

Greenville, South Carolina  
\_\_\_\_\_, 2019

7-1-2019

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS,
	)	
COUNTY OF RICHLAND	)	Docket No.: 2018-CP-40-02425
	)	
JEFFERSON DAVIS, JR.,	)	
	)	
Plaintiff,	)	
	)	<b>CERTIFICATE OF SERVICE</b>
v.	)	
	)	
ELLEN WEAVER, ET AL.,	)	
	)	
Defendants.	)	

On July 9, 2019 I electronically mailed a copy of **Respondent Tony Denny's Notice and Motion of Transfer within Firm and Substitution of Counsel** to:

Geoffrey K. Chambers, Esquire  
g.k.chambers@gmail.com

Christopher S. Elliott, Esquire  
celliott@boykinlawsc.com

Michael B. Wren, Esquire  
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Douglas W. MacKelcan, Esquire  
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James H. Goldin, Esquire  
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Joseph K. Carter, Jr. , Esquire  
kcarter@turnerpadget.com

Dawes M. Cooke, Esquire  
mdc@barnwell-whaley.com

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Joseph M. McCulloch, Esquire  
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Williams H. Jordan, Esquire  
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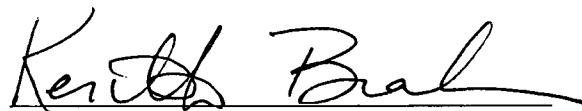
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Mark S. Barrow, Esquire  
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Martin S. Driggers, Esquire  
msd@swblaw.com

Christopher J. Daniels, Esquire  
chris.daniels@nelsonmullins.com

A handwritten signature in black ink, appearing to read "Kerith Branham". The signature is written in a cursive style with a horizontal line underneath the name.

Kerith Branham

# Turner | Padget

Alan G. Jones  
E-Mail: [agjones@turnerpadget.com](mailto:agjones@turnerpadget.com)  
Direct Dial: 864-552-4626  
Direct Fax: 864-282-5989

July 9, 2019

Jenny Abbott Kitchings  
Richland County Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

**RECEIVED**  
JUL 12 2019  
SC Court of Appeals

Re: Davis v Denny  
Docket No.: 2018-CP-40-02425  
Claim No: 039046677  
TP File No.: 01464.07984

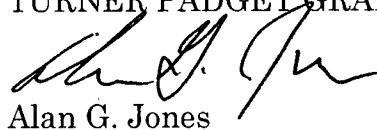
Dear Ms. Kitchings:

Enclosed is respondent Tony Denny's Notice and Motion of Transfer within Firm and Substitution of Counsel in the above-referenced matter. Should you have any questions or concerns, please do not hesitate to contact me.

With kind regards,

Sincerely,

TURNER PADGET GRAHAM & LANEY, P.A.



Alan G. Jones

AGJ/klb  
Enclosures

**Turner | Padgett**

P.O. Box 1509, Greenville, SC 29602

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