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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

RECEIVED

AUG 16 2019

Marvin H. Dukes, III, Master in Equity

SC Court of Appeals

Case No. 2019-000314

Bradley Circle Vacation Partners, LLC, and
Monti Development HH, LLC.....Appellants,

v.

Town of Hilton Head Island, Town of Hilton Head Island Board of Zoning Appeals,
Tamara Becker and Rhonda Carper.....Respondents.

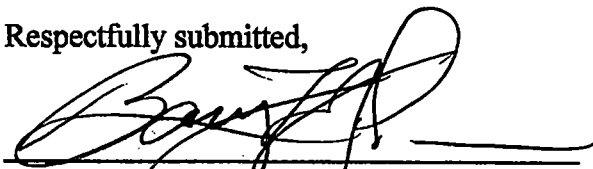
RESPONDENTS TAMARA BECKER AND RHONDA CARPER'S NOTICE OF MOTION
AND MOTION FOR RELIEF OF COUNSEL

Pursuant to Rule 264, SCACR, Respondents, Tamara Becker and Rhonda Carper ("Respondents"), move this Court for an Order relieving its counsel, Barry L. Johnson, in this matter. Further, Respondents seek an Order allowing Respondents thirty (30) days to seek new counsel, and if they are unable to retain new counsel, Respondents shall proceed *pro se* in this matter. Finally, Respondents seek an Order allowing them thirty (30) additional days in which to file their Initial Reply Brief and to respond to the Designation of Matter.

Respondents confirm they have given their consent to the withdrawal of their counsel, Barry L. Johnson and his law firm, Johnson & Davis, PA, and that proper notice of this Motion has been provided to the other parties, and no objection was received.

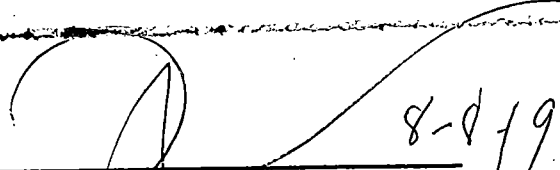
BJD 15
August 7, 2018

Respectfully submitted,

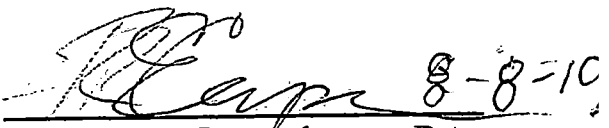


Barry L. Johnson, Attorney at Law
JOHNSON & DAVIS, PA
The Victoria Building, Suite 200
10 Pinckney Colony Road
Bluffton, SC 29909
(843) 815-7121
barry@jd-pa.com

Attorney for Appellant



Tamara Becker, Respondent Date *8-8-19*



Ronda Carper, Respondent Date *8-8-19*

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CERTIFICATE OF SERVICE

I, Cara L. Okupski, an employee of **JOHNSON & DAVIS, PA**, do hereby certify that on August 15, 2019, I served a copy(ies) of the below listed document(s), upon the person(s) listed below, by e-mail transmission and by placing in the U.S. Mail, postage pre-paid, as follows.

Document(s): Respondents Tamara Becker and Rhonda Carper's Notice of Motion and Motion for Relief of Counsel

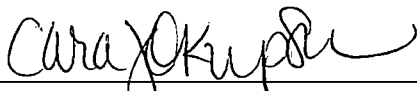
Delivered to:

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Drew A. Laughlin, Esquire
LAUGHLIN & BOWEN, P.C.
P.O. Drawer 21119
Hilton Head Island, SC 29925
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Hilton Head Island, SC 29926



Cara L. Okupski



JOHNSON & DAVIS, PA
ATTORNEYS

BARRY L. JOHNSON**
HUTSON S. DAVIS, JR.*
S. HARRISON WILLIAMS

*Certified SC Mediator
+Certified SC Arbitrator

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BARRY L. JOHNSON
BARRY@JD-PA.COM

August 15, 2019

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court for the South Carolina
Court of Appeals
1220 Senate Street
Columbia, SC 29211

Re: *Bradley Circle Vacation Partners, LLC and Monti Development HH, LLC vs. Town of Hilton Head Island, Town of Hilton Head Island Board of Zoning Appeals, Tamara Becker and Rhonda Carper*
Case No.: 2019-000314
J&D, PA File No.: B18-6631

Dear Ms. Abbott Kitchings:

Enclosed for filing with the Court, please find the originals and six copies of *Respondents Tamara Becker and Rhonda Carper's Notice of Motion and Motion for Relief of Counsel*, along with a Certificate of Service, in regard to the above-referenced matter.

Thanking you, and with best wishes, I am

Most sincerely,

Cara L. Okupski
Legal Assistant

:clo

cc: Drew A. Laughlin, Esquire
Curtis L. Coltrane, Esquire
Ronda Carper
Tamara Becker

BARRY L. JOHNSON, ESQUIRE
843-815-7121
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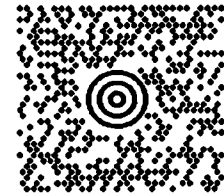
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1 OF 1

SHIP TO:

JENNY ABBOTT KITCHINGS
THE HONORABLE MS. ABBOTT KITCHINGS
COURT OF APPEALS
CLERK OF COURT FOR THE SC
1220 SENATE STREET
COLUMBIA SC 29201

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Reference #1: B18-6631

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