

90704

THE SOUTH CAROLINA COURT OF APPEALS

Latoria R. Cooks, Appellant

v.

Pearlz Vista, Inc. d/b/a Pearlz Oyster Bar, Carolina Ale House Operating Company, LLC, d/b/a Carolina Ale House, and Art Bar, Inc., Respondents

Appellate Case No. 2018-002026

RECEIVED
AUG 29 2019
SC Court of Appeals

The Honorable Paul M. Burch

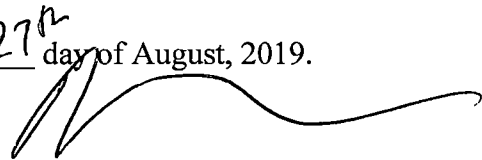
Richland County

Trial Court Case No. 2017CP4005538

MOTION TO WITHDRAW AND TO SUBSTITUTE COUNSEL

Please take notice that Robert D. Moseley, Jr. and Megan Early-Soppa of Moseley Marcinak Law Group LLP, have entered an appearance in the above-referenced case as counsel for Respondent Carolina Ale House Operating Company, LLC d/b/a Carolina Ale House. Mr. Riordan is no longer representing the Respondent in this matter and would request an Order substituting Robert D. Moseley, Jr. and Megan Early-Soppa in place of John P. Riordan as counsel for the Respondent.

Respectfully submitted this 27th day of August, 2019.



Robert D. Moseley, Jr. (SC Bar #64084)
Megan Early-Soppa (SC Bar # 101186)
Moseley Marcinak Law Group LLP
4324 Wade Hampton Blvd., Suite B
Taylors, South Carolina 29687
PO Box 26148, Greenville, SC 29616

(864) 248-6025 (864) 248-6035 (Fax)

Rob.Moseley@momarlaw.com

Megan.Early@momarlaw.com

Attorneys for Respondent

Carolina Ale House Operating Company, LLC

d/b/a Carolina Ale House

I CONSENT:

Handwritten signature of John P. Riordan in cursive, with the initials "JPR" at the end.

John P. Riordan (SC Bar #65284)

Fox Rothschild LLP

PO Box 87

Greenville, SC 29602

864-751-7600

jriordan@foxrothschild.com

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PROOF OF SERVICE


I certify that I have served the Motion to Withdraw and to Substitute Counsel of Robert D. Moseley, Jr. and Megan Early-Soppa, attorneys for Respondent Carolina Ale House Operating Company, LLC d/b/a Carolina Ale House, on attorneys of record this 27th day of August, 2019, by depositing a copy of it in the United States Mail, postage prepaid, addressed to:

Sarah P. Spruill
Haynsworth Sinkler Boyd
PO Box 2048
Greenville, SC 29602

John W. Carrig, Jr.
120 North Lake Drive
Lexington, SC 29071

Joseph M. McCulloch
McCulloch & Schillaci
PO Box 11623
Columbia, SC 29211

John P. Riordan
Fox Rothschild LLP
PO Box 87
Greenville, SC 29602



Robert D. Moseley, Jr. (SC Bar #64084)
Megan Early-Soppa (SC Bar # 101186)
Moseley Marcinak Law Group LLP
4324 Wade Hampton Blvd., Suite B
Taylors, South Carolina 29687
PO Box 26148, Greenville, SC 29616
(864) 248-6025 (864) 248-6035 (Fax)
Rob.Moseley@momarlaw.com
Megan.Early@momarlaw.com
Attorneys for Respondent
Carolina Ale House Operating Company, LLC
d/b/a Carolina Ale House



MOSELEY
MARCINAK
LAW GROUP

Robert D. Moseley, Jr.
Direct Dial: 864.248.6026
Email: Rob.Moseley@momarlaw.com

August 27th, 2019

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

Re: Latoria R. Cooks v Perlz Vista, Inc. d/b/a Pearlz Oyster Bar,
Carolina Ale House Operating Company, LLC d/b/a Carolina Ale House
and Art Bar, Inc.
Appellate Case No. 2018-002026

Dear Ms. Kitchings:

Enclosed for filing is the original and one copy of a Motion to Withdraw and to Substitute Counsel, together with our Proof of Service for the same. Also enclosed is our firm check in the amount of \$50.00 representing the filing fee for the Motion.

Thank you for your consideration.

With best regards, I remain,

Very truly yours,

Robert D. Moseley, Jr.
Moseley Marcinak Law Group LLP

RDMjr:csb
Enclosures

cc: John P. Riordan
Fox Rothschild LLP
PO Box 87
Greenville, SC 29602

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
August 26, 2019
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Sarah P. Spruill
Haynsworth Sinkler Boyd
PO Box 2048
Greenville, SC 29602

John W. Carrig, Jr.
120 North Lake Drive
Lexington, SC 29071

Joseph M. McCulloch
McCulloch & Schillaci
PO Box 11623
Columbia, SC 29211



Moseley Marcinak Law Group
PO Box 26148
Greenville, SC 29616

Rob Moseley



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