

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM THE RICHLAND COUNTY CIRCUIT COURT  
L. CASEY MANNING, Richland County Circuit Court Judge

Appellate Case No. 2017-000617  
Case No. 2016-CP-40-00946

**RECEIVED**

OCT 02 2019

SC Court of Appeals

South Carolina Public Interest Foundation, and William B. DePass, Jr.,  
individually, and on behalf of all others similarly situated..... Appellants,

v.

The City of Columbia, Richland County, and Fairfield County..... Respondents.

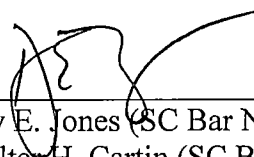
**MOTION TO WITHDRAW RAY N. STEVENS AS COUNSEL  
FOR RICHLAND COUNTY AND  
FAIRFIELD COUNTY AND  
NOTICE OF TRANSFER WITHIN FIRM**

Pursuant to Rule 264(b), SCACR, counsel for Respondents Richland County and Fairfield County respectfully request the Court issue an order withdrawing Mr. Ray N. Stevens as counsel of record on behalf of Richland County and Fairfield County in the above-captioned matter. Previously, and while employed at the firm of Parker Poe Adams & Bernstein, LLP, Mr. Stevens appeared on behalf of Respondents Richland County and Fairfield County in this matter. Mr. Stevens has since left the firm, and he is now the Administrator of Appeals at the South Carolina Department of Revenue.

Respondents Richland County and Fairfield County shall continue to be represented by Mr. Ray E. Jones and Mr. Walter H. Cartin of Parker Poe Adams & Bernstein, LLP. As evidenced by the attached **Exhibit A** and **Exhibit B**, Respondents Richland County and Fairfield County have consented to the withdrawal of Mr. Ray

Stevens as counsel of record and the appearance of Mr. Walter H. Cartin as counsel of record.

For the foregoing reasons, Respondents Richland County and Fairfield County request the Court enter an order withdrawing Mr. Ray N. Stevens as counsel. The representation of Respondents Richland County and Fairfield County shall remain with Mr. Ray E. Jones and Walter H. Cartin of Parker Poe Adams & Bernstein, LLP, and all future filings and correspondence herein should be directed to the undersigned.



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Ray E. Jones (SC Bar No. 11322)  
Walter H. Cartin (SC Bar No. 78405)  
Parker Poe Adams & Bernstein LLP  
1221 Main Street, Suite 1100 (29201)  
Post Office Box 1509  
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[rayjones@parkerpoe.com](mailto:rayjones@parkerpoe.com)  
[waltcartin@parkerpoe.com](mailto:waltcartin@parkerpoe.com)

*Attorneys for Respondents  
Richland County and Fairfield County*

October 2, 2019

**EXHIBIT A**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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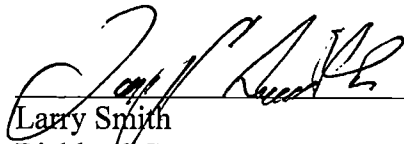
South Carolina Public Interest Foundation, and William B. DePass, Jr.,  
individually, and on behalf of all others similarly situated..... Appellants,

v.

The City of Columbia, Richland County, and Fairfield County..... Respondents.

**RESPONDENT RICHLAND COUNTY'S CONSENT  
TO THE WITHDRAWAL OF RAY N. STEVENS  
AS COUNSEL OF RECORD**

Respondent Richland County consents to Mr. Ray N. Stevens withdrawing as counsel of record in the above-captioned matter. Mr. Ray E. Jones and Mr. Walter H. Cartin of Parker Poe Adams & Bernstein, LLP will continue as counsel of record for Respondent Richland County in the above-captioned matter.

  
\_\_\_\_\_  
Larry Smith  
Richland County

Date: 9-30-2019

**EXHIBIT B**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM THE RICHLAND COUNTY CIRCUIT COURT  
L. CASEY MANNING, Richland County Circuit Court Judge

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Appellate Case No. 2017-000617  
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individually, and on behalf of all others similarly situated..... Appellants,

v.

The City of Columbia, Richland County, and Fairfield County..... Respondents.

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**RESPONDENT FAIRFIELD COUNTY'S CONSENT  
TO THE WITHDRAWAL OF RAY N. STEVENS  
AS COUNSEL OF RECORD**

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Respondent Fairfield County consents to Mr. Ray N. Stevens withdrawing as counsel of record in the above-captioned matter. Mr. Ray E. Jones and Mr. Walter H. Cartin of Parker Poe Adams & Bernstein, LLP will continue as counsel of record for Respondent Fairfield County in the above-captioned matter.

  
\_\_\_\_\_  
Jason Taylor  
Fairfield County

Date: \_\_\_\_\_ 9-10-19

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM THE RICHLAND COUNTY CIRCUIT COURT  
L. CASEY MANNING, Richland County Circuit Court Judge

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Case No. 2016-CP-40-00946  
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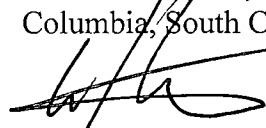
**PROOF OF SERVICE**

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The undersigned hereby certifies that on October 2, 2019 he has caused a copy of **MOTION TO WITHDRAW RAY N. STEVENS AS COUNSEL FOR RICHLAND COUNTY AND FAIRFIELD COUNTY AND NOTICE OF TRANSFER WITHIN FIRM** to be served upon all parties of record by depositing a copy of the same in the United States Mail, postage prepaid, addressed as follows:

James G. Carpenter, Esquire  
The Carpenter Law Firm, PC  
819 East North Street  
Greenville, South Carolina 29601

Burnet Maybank III, Esquire  
Nexsen Pruet, LLC  
1230 Main Street, Suite 700  
Columbia, South Carolina 29201



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Ray E. Jones (SC Bar No. 11322)  
Walter H. Cartin (SC Bar No. 78405)  
Parker Poe Adams & Bernstein LLP  
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[waltcartin@parkerpoe.com](mailto:waltcartin@parkerpoe.com)

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SC Court of Appeals

October 2, 2019

*Attorneys for Respondents  
Richland County and Fairfield County*



**Walter H. Cartin**  
*Partner*  
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Atlanta, GA  
Charleston, SC  
Charlotte, NC  
Columbia, SC  
Greenville, SC  
Raleigh, NC  
Spartanburg, SC  
Washington, DC

October 2, 2019

***VIA HAND DELIVERY***

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

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**SC Court of Appeals**

**Re: *Appellate Case No. 2017-000617  
South Carolina Public Interest Foundation and William B. DePass, Jr.,  
individually, and on behalf of all others similarly situated vs. The City of  
Columbia, Richland County, and Fairfield County***

Dear Ms. Kitchings:

Enclosed please find an original and six copies of the Motion to Withdraw Ray N. Stevens as Counsel for Richland County and Fairfield County and Notice of Transfer Within Firm in the above-referenced matter. Also enclosed is our Firm's check in the amount of \$50.00 in satisfaction of the Court's filing fee.

By copy of this letter and as evidenced by the Proof of Service filed herewith, we are serving a copy of the Motion on all counsel of record. Should you have any questions regarding this matter, please do not hesitate to contact me. With best regards, I am

Sincerely,

Walter H. Cartin

WHC/ccq  
Enclosures

cc: James G. Carpenter (*with enclosure via U.S. Mail*)  
Burnet Maybank III, Esquire (*with enclosure via U.S. Mail*)

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