

90807

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY  
COMMON PLEAS COURT

EDWARD W. MILLER, COMMON PLEAS COURT JUDGE

CASE NO.: 2017-CP-23-04936  
APPELLATE CASE NO.: 2019-000882

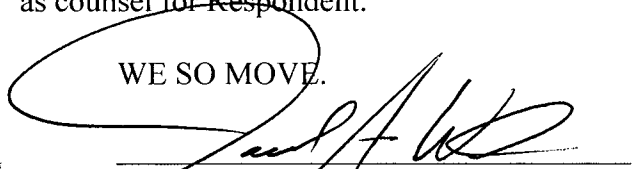
**RECEIVED**  
SEP 09 2019  
SC Court of Appeals  
Appellant,

State of South Carolina.....Appellant,  
v.  
Danny Jame Plumley.....Respondent.

**MOTION TO SUBSTITUTE COUNSEL**

Pursuant to Rule 264, SCACR, Respondent Danny Jame Plumley moves for an order of substitution of counsel. Respondent desires to have David A. Wilson, of the firm of Wilson & Englebardt, LLC, serve as his appellate counsel in the above captioned appeal. David A. Wilson consents to being substituted as counsel for Respondent. Steve W. Sumner consents to withdrawing as counsel for Respondent.

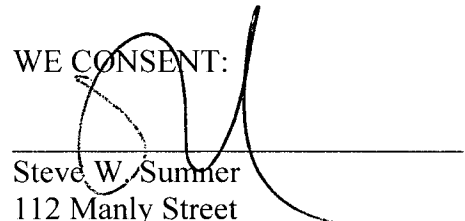
WE SO MOVE.



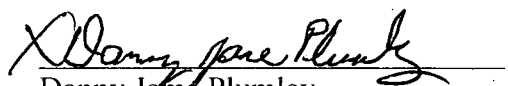
David A. Wilson  
Wilson & Englebardt, LLC  
200 Whitsett Street, Suite 100B  
Greenville, South Carolina 29601  
(864) 232-2329

August 5, 2019

WE CONSENT:



Steve W. Sumner  
112 Manly Street  
Greenville, SC 29601  
(864) 235-3834

  
Danny Jame Plumley  
Respondent

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM GREENVILLE COUNTY  
COMMON PLEAS COURT

EDWARD W. MILLER, COMMON PLEAS COURT JUDGE

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CASE NO.: 2017-CP-23-04936  
APPELLATE CASE NO. 2019-000882

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Sate of South Carolina.....Appellant,

v.

Danny Jame Plumley..... Respondent.

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**PROOF OF SERVICE**

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I certify that I have served the Motion to Substitute Counsel on Appellant by depositing a copy to them and in the United States Mail, Postage prepaid, on August 20, 2019 addressed as follows:

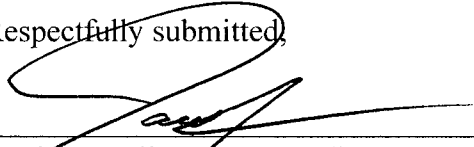
Haley E. Kernell, Esquire  
Greenville County Attorney's Office  
305 E North Street, Suite 325  
Greenville, SC 29601

William M. Blich, Jr., Esquire  
Joshua A. Edwards, Esquire  
S.C. Attorney General's Office  
PO Box 11549  
Columbia, SC 29211

Mitchell K. Byrd, Sr., Esquire  
114 Amber Drive  
Greenville, SC 29607

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SEP 09 2019  
SC Court of Appeals

Respectfully submitted,



---

David A. Wilson, S.C. Bar#65273

Wilson & Englehardt, LLC

200 Whitsett Street, Suite 100B

Greenville, South Carolina 29601

(864) 232-2329

(864) 232-2350 (fax)

ATTORNEY FOR RESPONDENT

September 6, 2019



**WILSON & ENGLEBARDT, LLC**  
LITIGATION • APPEALS • DISPUTE RESOLUTION

David A. Wilson  
Eric K. Englehardt

September 6, 2019

dwilson@GreenvilleSCLaw.com  
eric@GreenvilleSCLaw.com

The Honorable Jenny Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**Re: State of South Carolina, Appellant v. Danny Jame Plumley,  
Respondent  
Appellate Case No.: 2019-000882**

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of my Motion to Substitute Counsel in the above-referenced case along with the proof of service upon Appellant.

Also, enclosed is our firm's check in the amount of \$50.00 as the required filing fee for this request. Please return the filed copies to me in the enclosed self-addressed stamped envelope.

If you have any questions or concerns, please feel free to contact me.

Thank you for your assistance.

Sincerely,



David A. Wilson

DAW/ccb  
Enclosures

cc: Danny Plumley (Via Email)  
Steve W. Sumner, Esquire  
Mitchell E. Byrd, Sr., Esquire  
Haley E. Kernell, Esquire  
William M. Blich, Jr., Esquire  
Joshua A. Edwards, Esquire

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SEP 09 2019  
SC Court of Appeals

Wilson & Englehardt, LLC  
200 Whitsett Street, Suite 100B  
Greenville, SC 29601

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SEP 09 2019

SC Court of Appeals

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Honorable Jenny Kitchings  
South Carolina Court of Appeals  
Clerk of Court  
PO Box 11629  
Columbia SC 29211-1629