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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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OCT 15 2019

SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas  
Eugene C. Griffith, Jr., Circuit Court Judge

Appellate Case No. 2019-000728

National Trust for Historic Preservation in the United States and the  
City of Charleston ..... Respondents/Appellants,

v.

City of North Charleston ..... Appellant/Respondent.

**PETITION TO WITHDRAW AS COUNSEL**

In accordance with the provisions of Rule 264(b), SCACR, the undersigned Petitioner seeks an Order of this Honorable Court, allowing her to withdraw from representation of Respondent/Appellant, National Trust for Historic Preservation in the United States (the "National Trust").

In support of the requested relief, Petitioner states as follows:

1. Petitioner has served as counsel of record for the National Trust in association with the National Trust's principal counsel of record, G. Trenholm Walker of Walker Gressette Freeman & Linton, LLC.
2. Petitioner is a counsel of record for the National Trust in the pending appeal.
3. Petitioner has recently changed law firms and has advised the National Trust of that change.
4. With the National Trust's consent, the Petitioner seeks to withdraw her representation and have Mr. Walker continue in representation of the National Trust in connection with the above-referenced appeal.
5. The National Trust has consented to Petitioner's withdrawal as counsel in the above-referenced appeal.

6. Granting the relief Petitioner seeks will not disrupt the National Trust's representation or delay in any manner prosecution of the pending appeal.

WHEREFORE, for the reasons stated in this Petition, the undersigned counsel requests this Honorable Court to issue an Order granting permission for withdrawal of representation of the National Trust in this appeal.

Respectfully submitted, this the 4<sup>th</sup> day of October, 2019.



Amy H. Wooten

Midkiff, Muncie & Ross, P.C.

N.C. State Bar No. 39762

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*Attorney for Respondent/Appellant National  
Trust for Historic Preservation in the United  
States*

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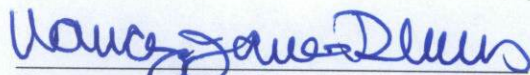
**PROOF OF SERVICE**

I certify that I have served the **PETITION TO WITHDRAW AS COUNSEL** by depositing a copy in the United States Mail, postage prepaid, on October 11, 2019, addressed to the attorneys of record:

Derk Van Raalte, IV  
J. Brady Hair  
Law Office of Brady Hair  
P.O. Box 61896  
North Charleston, SC 29419  
*Attorneys for Appellant/Respondent*

Frances I. Cantwell  
Daniel Simmons McQueeney, Jr.  
Susan J. Herdina  
City of Charleston Legal Department  
50 Broad Street  
Charleston, SC 29401

*Attorneys for Respondent/Appellant The City  
of Charleston*



Nancy Jane Dennis  
Paralegal

G. TRENHOLM WALKER  
Direct: 843.727.2208  
Email: [Walker@WGFLAW.com](mailto:Walker@WGFLAW.com)

October 11, 2019

*U.S. Mail*

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

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SC Court of Appeals

Re: National Trust for Historic Preservation in the United States and City of Charleston v. City of North Charleston, Case No. 2018-CP-10-0851  
Appellate Case No. 2019-000728  
WGFL File No. : 8081-001

Dear Ms. Kitchings:

Enclosed please find the original and 6 copies of Petition of Amy Wooten to Withdraw as Counsel for Respondent/Appellant National Trust with proof of service and filing fee of \$50. All other counsel of record consent to her withdrawal.

Thank you for filing the enclosures with the Court. With kind regards, I am,

Very Truly Yours,

WALKER, GRESSETTE, FREEMAN, & LINTON, LLC



G. Trenholm Walker

Enclosures (As Stated)

c: J. Brady Hair, Esq.  
Derk Van Raalte, Esq.  
Susan J. Herdina, Esq.  
Frances I. Cantwell, Esq.  
Daniel S. ("Chip") McQueeney, Jr., Esq.  
Amy H. Wooten, Esq. (E-mail only)

**WALKER  
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SC Court of Appeals

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