

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Edward W. Miller, Circuit Court Judge

Appellate Case No. 2019-000182

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SC Court of Appeals

Donald Stanley and Sean Reiter,
Individually and as Class Representatives, Respondents,

v.

Southern States Police Benevolent Association, Inc., Appellant.

APPELLANT’S COUNSEL’S MOTION TO WITHDRAW

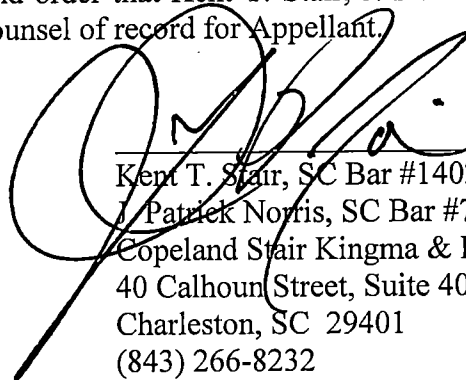
Pursuant to Rule 264(b) of the South Carolina Rules of Appellate Procedure, the undersigned counsel respectfully move this Court to withdraw from representing Appellant, Southern States Police Benevolent Association, Inc. (“SSPBA”), with consent of SSPBA and notice to the adverse parties. Grounds for this Motion are as follows:

1. Appellant, by and through its counsel, filed this Appeal on February 5, 2019.
2. Kent T. Stair, Esq., J. Patrick Norris, Esq., and J. Andrew Yoho, Esq. of law firm Carlock, Copeland & Stair, LLP n/k/a Copeland, Stair, Kingma & Lovell, LLP (“CSKL”) are currently listed as counsel of record for Appellant, along with James E. Bradley, Esq., the Moore Taylor Law Firm, P.A., Barry Goheen, Esq., and law firm Fisher Broyles, LLP.
3. J. Andrew Yoho, Esq. has since left CSKL and joined another law firm.
4. Kent T. Stair, Esq., J. Patrick Norris, Esq., and CSKL, with Appellant’s consent, now seek to withdraw as counsel of record for Appellant, and all parties have consented to said withdrawal.

5. J. Andrew Yoho, Esq., James E. Bradley, Esq., the Moore Taylor Law Firm, P.A., Barry Goheen, Esq., and law firm Fisher Broyles, LLP shall remain as counsel of record for Appellant.

WHEREFORE, for the above reasons, undersigned counsel respectfully requests that this Court grant this Motion and order that Kent T. Stair, J. Patrick Norris, and the law firm of CSKL be removed as counsel of record for Appellant.

November 20, 2019



Kent T. Stair, SC Bar #14029
J. Patrick Norris, SC Bar #78270
Copeland Stair Kingma & Lovell, LLP
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(843) 266-8232

**Attorneys for Appellant Southern States
Police Benevolent Association, Inc.**

STATE OF SOUTH CAROLINA)
)
 COUNTY OF CHARLESTON)
)
 DONALD STANLEY AND SEAN)
 REITER, INDIVIDUALLY AND AS)
 CLASS REPRESENTATIVES,)
)
 Plaintiffs,)
)
 v.)
)
 SOUTHERN STATES POLICE)
 BENEVOLENT ASSOCIATION, INC.,)
)
 Defendant.)

IN THE COURT OF COMMON PLEAS
 THE NINTH JUDICIAL CIRCUIT
 CASE NO.: 2016-CP-10-4062

**CONSENT MOTION FOR WITHDRAWAL
 AS COUNSEL ON BEHALF OF
 DEFENDANT SOUTHERN STATES
 POLICE BENEVOLENT ASSOCIATION,
 INC.**

COME NOW Kent T. Stair, Esq. and J. Patrick Norris, Esq., moving by consent to permit the withdrawal of Kent T. Stair, Esq., J. Patrick Norris, Esq., and their law firm of Carlock, Copeland & Stair, LLP *n/k/a* Copeland, Stair, Kingma & Lovell, LLP as counsel of record for Defendant Southern States Police Benevolent Association, Inc. (“Defendant SSPBA”) as follows:

1. Kent T. Stair, Esq., J. Patrick Norris, Esq., and the law firm of Carlock, Copeland & Stair, LLP *n/k/a* Copeland, Stair, Kingma & Lovell, LLP were retained to represent and defend Defendant SSPBA and entered an appearance as counsel of record for Defendant SSPBA in the above-captioned case.

2. James E. Bradley, Esq., the Moore Taylor Law Firm, P.A., and Barry Goheen, Esq. and the law firm Fisher Broyles, LLP were subsequently and separately retained to represent and defend Defendant SSPBA, and also entered their appearance as counsel of record for Defendant SSPBA in the above-captioned case.

3. Kent T. Stair, Esq., J. Patrick Norris, Esq., and the law firm of Carlock, Copeland & Stair, LLP n/k/a Copeland, Stair, Kingma & Lovell, LLP now request that James E. Bradley, Esq., the Moore Taylor Law Firm, P.A., and Barry Goheen, Esq. and the law firm Fisher Broyles, LLP remain as counsel of record for Defendant SSPBA.

4. Kent T. Stair, Esq., J. Patrick Norris, Esq., and the law firm of Carlock, Copeland & Stair, LLP n/k/a Copeland, Stair, Kingma & Lovell, LLP, hereby move to permit the withdrawal of Kent T. Stair, Esq., J. Patrick Norris, Esq., and the law firm of Carlock, Copeland & Stair, LLP n/k/a Copeland, Stair, Kingma & Lovell, LLP as counsel of record for Defendant SSPBA.

WHEREFORE, the undersigned respectfully request that this Court grant this consent Motion and enter an Order granting leave for Kent T. Stair, Esq., J. Patrick Norris, Esq., and the law firm of Carlock, Copeland & Stair, LLP n/k/a Copeland, Stair, Kingma & Lovell, LLP to withdraw as counsel for Defendant SSPBA in this proceeding.

WE SO MOVE:

s/ Kent T. Stair

Kent T. Stair, Esq.

State Bar No.: 14029

J. Patrick Norris Esq.

State Bar No.: 78270

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(843) 727-0307

Attorneys for Defendant SSPBA

WE CONSENT:

s/ James E. Bradley

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Barry Goheen, Esq. (Pro Hac Vice)
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Atlanta, GA 30342
Attorneys for Defendant SSPBA

WE CONSENT:

s/ Ronald L. Richter, Jr.

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-and-

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Attorneys for Plaintiffs

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November 20, 2019

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SC Court of Appeals

VIA U.S. MAIL & E-MAIL

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

Re: Donald Stanley, *et al.* v. Southern States Police Benevolent Association, Inc.
Appellate Case No.: 2019-000182
CCS File No.: 4535-55135

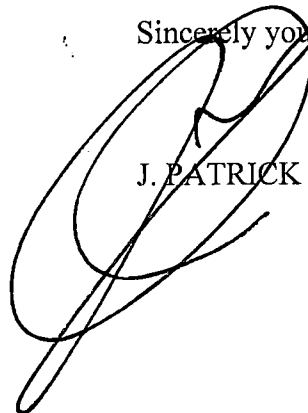
Dear Ms. Kitchings:

Enclosed for filing, please find an original and six (6) copies of Appellant's Motion for Withdrawal of Counsel regarding the above-referenced matter. I also enclose a check in the amount of \$50.00 to cover the cost of filing. Please file the Motion and return a file-stamped copy in the self-addressed envelope enclosed for your convenience. In addition, I have enclosed a filed copy of the Consent Motion of Withdrawal of Counsel, which has been filed with the Court of Common Pleas in Charleston County State Court on November 13, 2019.

By copy of this correspondence, I have served the same upon all counsel of record. If you have any questions or concerns, please do not hesitate to contact me.

Sincerely yours,

J. PATRICK NORRIS



JPN/map

Enclosure

cc: All Counsel of Record
Pamela Albanese

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