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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENWOOD COUNTY
Court of Common Pleas

Letitia H. Verdin, Circuit Court Judge

Case No.: 2018-000897

RECEIVED
FEB 13 2020
SC Court of Appeals

Rosa S. St. Gelais,.....Appellant,

v.

Julius L. Leary,Respondent.

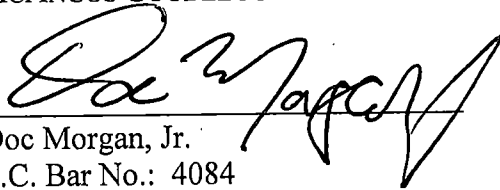
**MOTION FOR
SUBSTITUTION OF REPRESENTATION**

Pursuant to Rules 240 and 264, SCACR, Respondent Julius L. Leary hereby move this Court to substitute Doc Morgan, Jr. of McAngus, Goudelock & Courie, LLC, as counsel of record for Respondents in place of Carrie H. O'Brien of Walker, Allen, Grice, Ammons, Foy & Klick, LLP (hereinafter "Walker Allen"), in the above-captioned appeal. As is confirmed in the attached email correspondence, Carrie H. O'Brien nor Walker Allen, is no longer serving as counsel for Respondents in this appeal. (Exh. A). Counsel for Ms. Gelais has been notified of this change in counsel. (Exh. B). Allowing this substitution will not delay or cause prejudice to the parties in any manner.

CONCLUSION

Respondents request that this Court enter an order substituting Doc Morgan, Jr. of McAngus, Goudelock & Courie, LLC, as counsel of record for Respondents in place of Carrie H. O'Brien of Walker Allen, in the above-captioned appeal.

Respectfully submitted,
MCANGUS GOUDELOCK & COURIE



Doc Morgan, Jr.
S.C. Bar No.: 4084
Post Office Box 2980
55 E Camperdown Way, Suite 300 (29601)
Greenville, South Carolina 29602
(864) 239-4000
dmorgan@mgclaw.com

Attorneys for Respondent Julius L. Leary

February 7, 2020

Melinda Owens

From: Allie Wallace <allie@walkerallenlaw.com>
Sent: Thursday, February 06, 2020 8:44 AM
To: Gail Inzero
Subject: Sub of Counsel

Good Morning:

Carrie O'Brien is no longer associated with Walker Allen and has consent to removal as counsel of record. With consent of the Defendant have requested the substitution of counsel of record to Doc Morgan.

Thank you,

Allie Wallace
Paralegal

1819 Charlotte Dr, Ste 210
Charlotte, NC 28203
D: (704) 264-0661
O: (704) 264-0159
F: (980) 819-6780

Goldsboro-Raleigh-Charlotte-Charleston/Mount Pleasant



Walker Allen is now using ZixMail to comply with Federal and State privacy laws. Use of ZixMail will protect the privacy and confidentiality of client information and our communication with those outside our firm by fully encrypting email content and attachments. If you already use ZixMail, emails will arrive in your inbox in the customary manner. If you are not an existing ZixMail customer, you will initially receive notice of encrypted email with simple use instructions. The instructions will provide a link directly to the Zix Message Center, where you will be directed through a simple, one-time registration process. After registration, you will be able to view the message and attachments. In the future, you will be able to receive these encrypted emails by simply clicking on an "open message" button in the notification email. After one-time activation, a recipient can respond to and compose new encrypted emails to our firm. If you have questions, please call our office. Thank you.



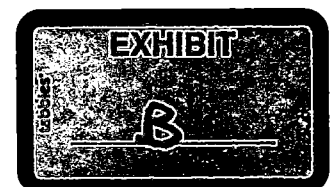
Doc Morgan

From: Doc Morgan
Sent: Thursday, February 06, 2020 3:51 PM
To: 'tinslerj@gmail.com'
Subject: Rosa St. Gelais v Julius Leary

Jamison,

Good to talk to you just now. This is to confirm that Carrie O'Brian is no longer with the Walker, Allen firm and will not be representing the Defendant/Respondent any longer. Travelers has transferred the file to our firm and to handle going forward. Look forward to working with you.

Doc



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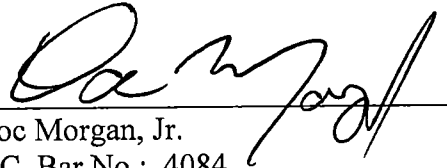
PROOF OF SERVICE

I certify that on the 7th day of February 2020, I served Respondent Julius L. Leary's **Motion for Substitution of Counsel** on the other parties to this appeal by depositing a copy of it in the United States Mail postage prepaid, addressed to the parties and attorneys of record as follows:

R. Jamison Tinsley, Jr.
Tinsley & Tinsley, P.C.
109 Oak Avenue
Greenwood, South Carolina 29646
Attorney for Appellant,
Rosa S. St. Gelais

Jeffrey T. Ammons
Walker, Allen, Grice, Ammons, Foy & Klick, LLP
1819 Charlotte Drive, Suite 210
Charlotte, NC 28203

MCANGUS GOUDELICK & COURIE



Doc Morgan, Jr.
S.C. Bar No.: 4084
Post Office Box 2980
55 E Camperdown Way, Suite 300 (29601)
Greenville, South Carolina 29602
(864) 239-4000
dmorgan@mgclaw.com

Attorneys for Respondent Julius L. Leary

February 6, 2020



Reply To

DOC MORGAN, JR.
Direct Dial: (864) 239-4028
dmorgan@mgclaw.com

February 7, 2020

VIA U.S. MAIL

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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SC Court of Appeals

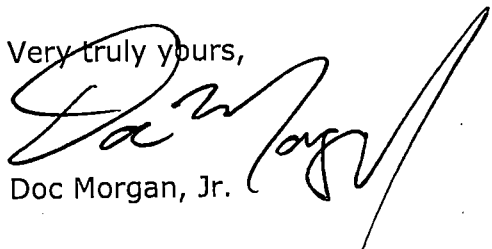
RE: Rosa S. St. Gelais v. Julius L. Leary
Appeal No. 2018-000897
Date of Incident: August 19, 2013
Carrier Claim No.: HNG8369
MGC File No.: 20527.20054

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of Respondent's Motion for Substitution of Counsel, and the original and one copy of the Proof of Service in the above-referenced matter. Please file the originals and return a clocked-in copy in the enclosed self-addressed, stamped envelope. Also enclosed is our firm's check in the amount of \$50 for filing the motion.

If you have any questions, please do not hesitate to contact me.

Very truly yours,


Doc Morgan, Jr.

GDM/mbo
Enclosures

cc: R. Jamison Tinsley, Jr., Tinsley & Tinsley, P.C. (w/encl.)
Jeffrey T. Ammons, Walker Allen Grice Ammons & Foy LLP (w/encl.)

McANGUS GOUDELCK & COURIE LLC

55 EAST CAMPERDOWN WAY
SUITE 300 (29601)
POST OFFICE BOX 2980
GREENVILLE, SC 29602

864.239.4000 PHONE
864.242.3199 FAX
WWW.MGCLAW.COM



mgc

POST OFFICE BOX 2950
GREENVILLE, SC 29602

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SC Court of Appeals

20527.20054/GDM/mbo
The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

