

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM KERSHAW COUNTY  
Court Of Common Pleas

Robert E. Hood, Circuit Court Judge

Case No. 2019-000624

RECEIVED  
FEB 10 2020  
SC Court of Appeals

Dottie R. Bell,

Appellant,

v.

John C. Bentley,

Respondent.

RESPONDENT'S MOTION TO SUBSTITUTE COUNSEL

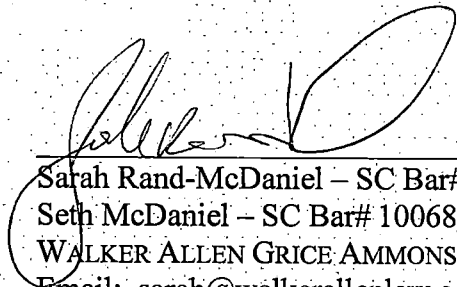
Pursuant to Rule 264(b) of the South Carolina Appellate Court Rules, Sarah Rand-McDaniel and Seth McDaniel of Walker, Allen, Grice, Ammons, Foy & Klick, LLP (hereinafter "Walker Allen"), hereby move to be formally substituted as counsel of record for Respondent in the above-captioned action. Counsel further request that Ms. Carrie H. O'Brien be removed as counsel for Respondent as she is no longer associated with Walker Allen. Written notice was provided to the insurance carrier for Respondent<sup>1</sup>, who consents to the withdrawal of Ms. O'Brien and the substitution of Sarah Rand-McDaniel and Seth McDaniel as counsel of record.

<sup>1</sup> Respondent is deceased.

WHEREFORE, the undersigned counsel and Respondent request that the Court enter an Order permitting Carrie H. O'Brien, formerly of Walker Allen, to withdraw as counsel of record for Respondent and further allow the substitution of Sarah Rand-McDaniel and Seth McDaniel as counsel of record for said Respondent.

Respectfully submitted,

THIS IS THE 6<sup>th</sup> DAY OF FEBRUARY, 2020.



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Sarah Rand-McDaniel – SC Bar# 101340  
Seth McDaniel – SC Bar# 100689  
WALKER ALLEN GRICE AMMONS FOY & KLICK LLP  
Email: [sarah@walkerallenlaw.com](mailto:sarah@walkerallenlaw.com)  
Email: [seth@walkerallenlaw.com](mailto:seth@walkerallenlaw.com)  
PO Box 1068  
Mount Pleasant, SC 29465-2946  
(854) 529-0595  
**ATTORNEYS FOR RESPONDENT**

**PROOF OF SERVICE**

I certify that a copy of the foregoing RESPONDENT'S MOTION TO SUBSTITUTE COUNSEL was served upon all counsel of Record

- as an attachment to an electronic correspondence
- by depositing a copy of the same in an official depository of the United States mail in a postage-paid envelope
- via facsimile, or
- by hand delivery

addressed as follows:

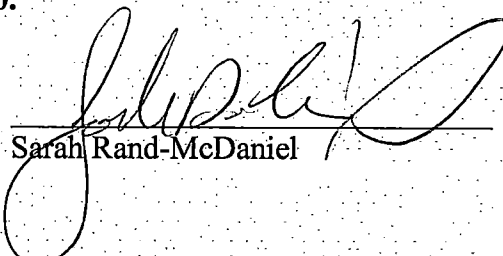
T. Jeff Goodwyn, Jr., Esquire  
Goodwyn Law Firm, LLC  
2519 Devine Street, Ste A.  
Columbia, SC 29205  
(803) 251-4517/(803) 251-4527 (F)  
[jgoodwyn@goodwynlaw.com](mailto:jgoodwyn@goodwynlaw.com)  
Attorney for Appellant

**RECEIVED**

FEB 10 2020

SC Court of Appeals

THIS IS THE 6<sup>th</sup> DAY OF FEBRUARY, 2020.

  
Sarah Rand-McDaniel



WALKER ALLEN  
TRIAL ATTORNEYS

WALKER, ALLEN, GRICE, AMMONS, FOY & KLICK, L.L.P.

JERRY A. ALLEN, JR.  
O. DREW GRICE, JR.  
JEFFREY T. AMMONS  
LOUIS F. FOY, III  
NORMAN F. KLICK, JR.  
AMANDA M. WELLS  
JACKIE S. HOUSER  
S. WALLACE CARNWATH, III

ALICIA R. JOHNSON  
SARAH RAND-MCDANIEL  
SETH MCDANIEL  
RYAN HUGGINS  
JOCELYNE RIEHL

ROBERT D. WALKER, JR.  
*Retired*

February 6, 2020

South Carolina Court of Appeals  
Clerk of Court  
Post Office Box 11629  
Columbia, SC 29211

RE: Dottie R. Bell v. John C. Bentley  
Case No.: 2019-000624

Dear Clerk:

Please find enclosed herewith the original Respondent's Motion to Substitute Counsel and one copy of same in the above-referenced matter. I have also enclosed my check in the amount of \$50.00 to cover the filing fee. Once the Motion has been filed, please return a clocked copy to me in the enclosed envelope. By copy of this letter to plaintiff's counsel, I have served him with this document.

Thank you in advance for your courtesy and kind cooperation. Please feel free to call me if you have any questions. I can be reached at 854-529-0595, extension 102.

Sincerely yours,

WALKER, ALLEN, GRICE, AMMONS & FOY, L.L.P.

Sarah Rand-McDaniel

SRM/cl  
37.321

Enclosure: As stated.

cc: T. Jeff Goodwyn, Jr., Esquire (w/enc.)

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