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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SUMTER COUNTY  
Court of Common Pleas  
R. Ferrell Cothran, Circuit Court Judge

Appellate Case No. 2017-000998  
Civil Action No. 2015-CP-43-596

**RECEIVED**  
MAR 05 2020  
SC Court of Appeals

Paul Branco and Branco Investments,  
Inc., d/b/a Great American Cookie Co., ..... Respondents,

v.

Hull Storey Retail Group, LLC, and  
Sumter Mall, LLC ..... Appellants.

**NOTICE AND PETITION TO WITHDRAW AS COUNSEL**

Pursuant to Rule 264(b), SCACR, Appellants Hull Storey Retail Group, LLC and Sumter Mall, LLC respectfully move this Court for an order allowing Timothy E. Madden to withdraw as counsel of record in this matter. The basis for this motion is that Mr. Madden will be resigning from Nelson Mullins Riley & Scarborough LLP shortly to begin his service as a Family Court Judge. Appellants have been provided with proper written notice and will not be prejudiced by this withdrawal because they will continue to be represented by Miles E. Coleman. Accordingly, Appellants request that Mr. Madden be relieved as counsel and removed from the court roster in this matter.

[SIGNATURE PAGE ATTACHED]

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: Miles Coleman

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Miles E. Coleman

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*Attorneys for Appellants Hull Storey Retail  
Group, LLC, and Sumter Mall, LLC*

March 5, 2020

Greenville, South Carolina

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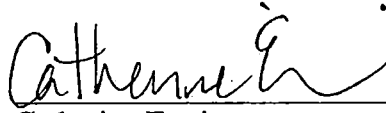
**PROOF OF SERVICE**

I, the undersigned Administrative Assistant, of the law offices of Nelson Mullins Riley & Scarborough LLP do hereby certify that I have served all counsel in this action with a copy of the pleading(s) specified below to the following addresses:

Pleadings: Notice and Petition to Withdraw as Counsel

Counsel Served: Patrick M. Killen  
McGowan, Hood & Felder, LLC  
28 N. Main Street  
Sumter, SC 29150

John S. Simmons  
Simmons Law Firm, LLC  
1711 Pickens Street  
Columbia, SC 29201

A handwritten signature in cursive script, appearing to read "Catherine Erwin".

---

Catherine Erwin  
Administrative Assistant

March 5, 2020  
Greenville, South Carolina



NELSON MULLINS RILEY & SCARBOROUGH LLP  
ATTORNEYS AND COUNSELORS AT LAW

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March 5, 2020

**HAND DELIVERED**

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

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MAR 05 2020  
SC Court of Appeals

RE: *Branco et al. v. Hull Storey Retail Group, LLC et al.*  
Appellate Case No. 20017-000998  
Civil Action No. 2015-CP-43-596  
Our File No. 53746/01500

Dear Ms. Kitchings:

Enclosed please find an original and seven copies of a Notice and Petition to Withdraw as counsel. We would ask that you file the original and six of the copies and return a file-stamped copy to us via our courier. Also enclosed is a Firm check for the filing fee associated with this Petition. By copy of this letter we are serving counsel of record with copies of the Petition.

Very truly yours,

Miles E. Coleman

Enclosures

cc: Patrick M. Killen, w/enclosures  
John S. Simmons, w/enclosures