

92556

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

APPEAL FROM GREENWOOD COUNTY
Court of Common Pleas

APR 03 2020

Letitia H. Verdin, Circuit Court Judge

SC Court of Appeals

Case No.: 2018-000897

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

v.

Julius L. Leary,Respondent.

**MOTION FOR
SUBSTITUTION OF REPRESENTATION**

The Court previously entered an Order substituting the undersigned as counsel for Respondent in place of Carrie H. O'Brien of the firm Walker, Allen, Grice, Ammons, Foy & Klick, LLP ("Walker Allen"). It appears that Sarah Rand-McDaniel of Walker Allen was inadvertently not substituted along with Ms. O'Brien. As set forth in the attached e-mail correspondence, Sarah Rand-McDaniel of Walker Allen will no longer be serving as counsel for Respondent in this appeal as well (Exhibit A). Allowing the substitution will not delay or cause prejudice to the parties in any manner.

Respondent requests this Court enter an Order or amend the previous Order setting forth that the Court's records are to be amended to show that Doc Morgan, Jr., Esquire is the only counsel for Respondent and that both Carrie H. O'Brien and Sarah Rand-McDaniel are no longer counsel for Respondent.

[SIGNATURE ON FOLLOWING PAGE]

Respectfully submitted,
MCANGUS GOUDELICK & COURIE

Doc Morgan, Jr. w/permission
Doc Morgan, Jr. *74950*
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

April 1, 2020

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

APR 03 2020

SC Court of Appeals

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

v.

Julius L. Leary,Respondent.

PROOF OF SERVICE

I certify that on the _____ day of March 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., Esquire
Tinsley & Tinsley, P.C.
109 Oak Avenue
Greenwood, South Carolina 29646
Attorney for Appellant,
Rosa S. St. Gelais

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

MCANGUS GOUELOCK & COURIE

Doc Morgan, Jr. w/permission
Doc Morgan, Jr. *of Brandon H. J. 74450*
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

April 1, 2020

Gail Inzero

From: Sarah McDaniel <sarah@walkerallenlaw.com>
Sent: Monday, March 30, 2020 4:43 PM
To: Gail Inzero
Subject: RE: Sub of Counsel - Rosa S. St. Gelais v. Julius L. Leary

Good Afternoon:

With consent of the Defendant, Sarah Rand-McDaniel requests the substitution of counsel of record to Doc Morgan.

Thank you,

Regards,

Sarah McDaniel
854-529-0595, ext. 102

From: Gail Inzero <gail.inzero@mgclaw.com>
Sent: Thursday, March 19, 2020 4:37 PM
To: Sarah McDaniel <sarah@walkerallenlaw.com>
Subject: RE: Sub of Counsel - Rosa S. St. Gelais v. Julius L. Leary

Ms. Walker,

I just wanted to follow up my e-mail below.

Thank you!

Gail

RECEIVED
APR 03 2020
SC Court of Appeals



Gail Inzero, Legal Assistant
gail.inzero@mgclaw.com
55 E. Camperdown Way Suite 300
Greenville, SC 29601
Main:864-239-4000 | Direct:864-239-6712 | Fax:864-242-3199
VCARD

This electronic mail may contain information that is confidential, attorney/client and/or work product privileged, prepared in anticipation of litigation and/or exempt from disclosure under applicable law. This transmission is intended solely for the individual or entity designated above. If you are not the intended recipient, you should understand that any distribution, copying, or use of the information is unauthorized and strictly prohibited. If you have received this electronic mail in error, please immediately notify the sender and destroy all copies which you may have of this communication!

Please consider the environment before printing this email.

From: Gail Inzero <gail.inzero@mgclaw.com>
Sent: Tuesday, March 17, 2020 3:49 PM
To: 'sarah@walkerallenlaw.com' <sarah@walkerallenlaw.com>
Subject: FW: Sub of Counsel - Rosa S. St. Gelais v. Julius L. Leary

Ms. Walker,

We just received the Order from the court on Doc's substitution of Counsel in the above-referenced case and it appears that you were representing the Respondent as well. You was not on the substitution of counsel that was filed. Therefore, we need another e-mail, like the one below, stating that you are to be removed as counsel of record and Doc is now representing. Can you assist me with this?

Thank you,

Gail

From: Allie Wallace <allie@walkerallenlaw.com>
Sent: Thursday, February 06, 2020 8:44 AM
To: Gail Inzero <gail.inzero@mgclaw.com>
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.



Reply To

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

April 1, 2020

VIA U.S. MAIL

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

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.

RECEIVED

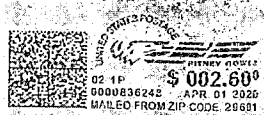
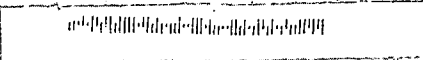
APR 03 2020

SC Court of Appeals

GDMjr/gvi

Enclosures

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



mgc

POST OFFICE BOX 2980
GREENVILLE, SC 29602

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

RECEIVED
APR 03 2020
SC Court of Appeals