

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

JUL 06 2020

SC Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

The Honorable Benjamin H. Culbertson, Circuit Court Judge

Case No. 2019-001199

Michelle M. Messer, Appellant,

v.

William J. Muse, Individually and as President of NEM, Inc.; NEM, Inc. d/b/a The Sandy Monkey; Sharon Cumbie; Kathryn Montorio; and Christopher B. Campbell, Defendants,

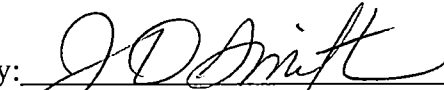
Of which William J. Muse, Individually and as President of NEM, Inc.; NEM, Inc. d/b/a The Sandy Monkey; Sharon Cumbie; and Kathryn Montorio are the Respondents

CONSENT MOTION FOR RELIEVING COUNSEL

TO: MICHELLE M. MESSER, APPELLANT, AND HER ATTORNEY JUSTIN D. BICE, ESQUIRE:

The Respondent hereby moves the South Carolina Court of Appeals for an Order pursuant to the request of the Appellate Court, to relieve Jenny Draffin Smith as counsel for the Respondent. Ms. Smith is leaving the firm of Aiken Bridges Elliott Tyler & Saleeby, and this Appeal will still be handled by the firm and J. Boone Aiken, III. Counsel for the Respondent has consulted with counsel for the Appellant who does not oppose and consents to this Motion.

Respectfully submitted,

By: 

JENNY DRAFFIN SMITH

SC BAR NO: 76129

J. BOONE AIKEN, III

SC Bar No.: 307

Aiken, Bridges, Elliott, Tyler & Saleeby, P.A.

PO Drawer 1931

Florence, SC 29503

Telephone: 843.669.8787

fax: 843.664.0097

JDS@AIKENBRIDGES.COM

JBA@AIKENBRIDGES.COM

**ATTORNEYS FOR THE RESPONDENTS
WILLIAM J. MUSE, INDIVIDUALLY AND AS
PRESIDENT OF NEM, INC.; NEM, INC. D/B/A
THE SANDY MONKEY; SHARON CUMBIE;
AND KATHRYN MONTORIO**

Florence, South Carolina
July 1, 2020

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APPEAL FROM HORRY COUNTY
Court of Common Pleas

JUL 06 2020

The Honorable Benjamin H. Culbertson, Circuit Court Judge

SC Court of Appeals

Case No. 2019-001199

Michelle M. Messer, Appellant,

v.

William J. Muse, Individually and as President of NEM, Inc.; NEM, Inc. d/b/a The Sandy Monkey; Sharon Cumbie; Kathryn Montorio; and Christopher B. Campbell, Defendants,

Of which William J. Muse, Individually and as President of NEM, Inc.; NEM, Inc. d/b/a The Sandy Monkey; Sharon Cumbie; and Kathryn Montorio are the Respondents

PROOF OF SERVICE

I certify that I have served the Respondent's Consent Motion for Relieving Counsel by depositing a copy of it in the United States Mail, postage prepaid, on July 1, 2020, addressed to her attorney of record, Justin D. Bice, 406 Tom Hall Street, Fort Mill, South Carolina 29715.

Signature on following page

By:



JENNY DRAFFIN SMITH

SC BAR NO: 76129

J. BOONE AIKEN, III

SC Bar No.: 307

Aiken, Bridges, Elliott, Tyler & Saleeby, P.A.

PO Drawer 1931

Florence, SC 29503

Telephone: 843.669.8787

fax: 843.664.0097

JDS@AIKENBRIDGES.COM

JBA@AIKENBRIDGES.COM

**ATTORNEYS FOR THE RESPONDENTS
WILLIAM J. MUSE, INDIVIDUALLY AND AS
PRESIDENT OF NEM, INC.; NEM, INC. D/B/A
THE SANDY MONKEY; SHARON CUMBIE;
AND KATHRYN MONTORIO**

Florence, South Carolina
July 1, 2020

Aiken Bridges Attorneys at Law

J. Boone Aiken, III •
Saunders M. Bridges, Jr. •+
E. Glenn Elliott •
Matthew N. Tyler •
James M. Saleeby, Jr.
J. David Banner
Samuel F. Arthur, III
Jay R. Lee
Preston B. Dawkins, Jr.
Carrie A. Fox •
J. Rufus Bratton, III
Jenny D. Smith
Lanier S. Felten

JDS@AIKENBRIDGES.COM
843-669-8787, ext. 304
Facsimile: 843-664-0097

Alvin A. Coleman (1930-1995)

July 1, 2020

RECEIVED

JUL 06 2020

SC Court of Appeals

•Certified Mediator/Arbitrator
+Also Admitted District of Columbia

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

Re: Michelle M. Messer, Appellant v. William J. Muse, Individually and as
President of NEM, Inc.; NEM, Inc. d/b/a The Sandy Monkey; Sharon Crumbie;
and Kathryn Montorio, Respondents.
Appellate Case No.: 2019-001-199
Our File No.: 33152

Dear Ms. Kitchings:

Enclosed with this letter please find the original and two (2) copies of the Consent Motion for Relieving Counsel. Please file the same with your Court.

We are also enclosing the original Certificate of Counsel and original Proof of Service indicating service by mail this day of service upon the Appellant's counsel.

Thank you for your assistance in this matter. Should you have any questions or comments regarding any of the above, please do not hesitate to call.

With kind regards, I remain

Sincerely,



JENNY DRAFFIN SMITH

JDS/lhn
Enclosure

Aiken, Bridges, Elliott, Tyler & Saleeby, P.A.

181 East Evans St. Suite 409
Florence, South Carolina 29506

www.aikenbridges.com

Post Office Drawer 1931
Florence, South Carolina 29503

Aiken
Bridges
Attorneys at Law

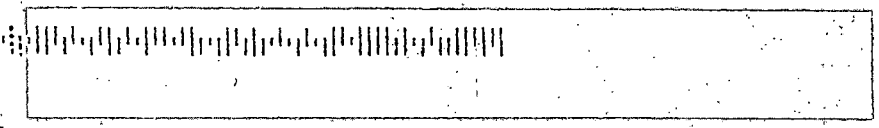
July 1, 2020

Page 2

Cc:

Justin D. Bice
406 Tom Hall Street
Fort Mill, SC 29715

**Aiken
Bridges**
Attorneys at Law
POST OFFICE DRAWER 1931
FLORENCE, S.C. 29503



RECEIVED
JUL 06 2020
SC Court of Appeals

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

FIRST-CLASS