

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Appellate Case No. 2020-000935

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge, Dorchester County
Maite Murphy, Circuit Court Judge, Dorchester County

Case No. 2018-CP-18-00729

Portfolio Recovery Associates, LLC Assignee of Synchrony Bank/HH Gregg
Respondent,

v.

Jennifer Campney, Defendant

and

Jennifer Campney, Third-party Plaintiff,

v.

Cooling & Winter, LLC, Third-party Defendant, of whom Jennifer Campney is the
Appellant.

MOTION FOR SUBSTITUTION OF COUNSEL FOR LIMITED PURPOSE OF APPEAL

NOW COMES J. Ronald Jones, Jr. of Smith Debnam Narron Drake Saintsing & Myers, LLP ("Smith Debnam"), pursuant to Rules 240 and 264, SCACR, seeking an order substituting him as counsel for the Respondent in the above-captioned appeal, and relieving Joseph E. Brown and S. Louis Schiappa of Cooling & Winter, LLC as counsel for the Respondent. In support of the relief requested herein, your undersigned shows unto this Court as follows:

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SC Court of Appeals

MEMORANDUM IN SUPPORT OF MOTION

1. This matter arises out of a dispute between PORTFOLIO RECOVERY ASSOCIATES, LLC, as assignee of Synchrony Bank/HH Gregg (hereinafter “PRA”) and JENNIFER CAMPNEY (“Appellant”), which culminated in the entry of an Order in favor of PRA entered by the Hon. Diane S. Goodstein, Circuit Court Judge for the Dorchester County Court of Common Pleas (the “Trial Court”).

2. Appellant filed a Notice of Appeal with this Court on June 25, 2020, seeking appellate review of the aforementioned Order, as well as two other related orders.

3. PRA was represented by Cooling & Winter, LLC and Joseph E. Brown and S. Louis Schiappa before the Trial Court.

4. Pursuant to Rule 264(a), SCACR, Messrs. Brown and Schiappa, as well as Cooling & Winter, LLC, are deemed to continue in their role as counsel for PRA before this Court, unless and until this Court approves their withdrawal or substitution.

5. PRA has retained your undersigned and Smith Debnam to represent it with respect to this appeal before this Court, and accordingly has notice of and consents to the substitution requested herein.

6. Cooling & Winter, LLC as well as Messrs. Brown and Schiappa know of and consent to the substitution requested herein.


7. Notice of this Motion is being provided to counsel for Appellant pursuant to Rules 240(d) and 264(b), SCACR.

8. The undersigned and Smith Debnam are appearing on behalf of PRA for the limited purposes of this appeal only, and not before any proceeding which may now be pending, or may be brought in the future, in the Trial Court or any similar lower court.

9. Accordingly, good cause exists to allow the substitution of counsel requested herein.

WHEREFORE, and for the reasons set forth above, the undersigned respectfully request entry of and Order substituting J. Ronald Jones, Jr. and Smith Debnam as attorneys of record for Respondent in this appeal only, and relieving Cooling & Winter, LLC and Messrs. Brown and Schiappa from further representation of Respondent with respect to this appeal.

Respectfully submitted this, the 10 day of July, 2020.



J. Ronald Jones, Jr. (SC Bar # 5874)
Smith Debnam Narron Drake Saintsing & Myers, LLP
171 Church Street, Suite 120
Charleston, SC 29401
Telephone: (843) 714-2535
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Proposed Attorneys for Respondent

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Appellant.

CERTIFICATE OF SERVICE

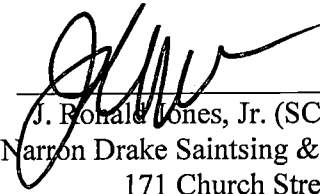
I certify that I have on this day served a copy of the foregoing **Motion for Substitution of Counsel for Limited Purpose of Appeal** upon all parties to this action by remitting copies of the same into sealed envelopes entrusted to the care and custody of the United States Postal Service, for mailing via first-class mail, postage prepaid, with each envelope properly addressed as follows:

John R. Cantrell, Jr.
CANTRELL LEGAL, PC
Post Office Box 1276
Goose Creek, SC 29445-1276
Attorney for Appellant

Joseph E. Brown
S. Louis Schiappa
COOLING & WINTER, LLC
220 N. Main Street, Suite 500
Greenville, SC 29601
Attorneys for Respondent

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Dated this, the 10 day of July, 2020.



J. Ronald Jones, Jr. (SC Bar # 5874)
Smith Debnam Narron Drake Saintsing & Myers, LLP
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Charleston, SC 29401
Telephone: (843) 714-2535
Email: Rjones@smithdebnamlaw.com

July 10, 2020

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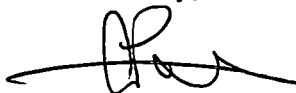
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: Portfolio Recovery Associates, LLC Assignee of Synchrony Bank/HH Gregg Respondent v. Jennifer Campney, Defendant v. Jennifer Campney, Third-party Plaintiff, v. Cooling & Winter, LLC, Third-party Defendant, of whom Jennifer Campney is the Appellant.
Appellate Case No.: 2020-000935
Common Pleas Case No.: 2018-CP-18-00729
Our File No. M80607.000027

Dear Sir/Madam,

Enclosed please see the \$50.00 check and the original Motion for Substitution of Counsel for Limited Purpose of Appeal, with 6 copies (our file M80607.000027). Kindly a filed copy back in the stamped self-addressed envelope provided. Please call our office if you have any questions or concerns.

Sincerely,



Crystal Patrick, Paralegal to
J. Ronald Jones, Jr.
Smith Debnam, Narron
Drake Saintsing & Myers, LLP
171 Church Street, Suite 120C
Charleston, SC 29401
843-714-2535

Enclosures

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ACTWGT: 1.00 LB
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SOUTH CAROLINA COURT OF APPEALS
SENATE STREET 1220

COLUMBIA SC 29201

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