

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED
Aug 14 2020

APPEAL FROM LANCASTER COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable Robert W. Davis
Special Referee

Appellate Case No.: 2020-000952

Buffalo Creek Investments, Inc., Plaintiff,

v.

Stephen H. Pettus a/k/a Stephen Pettus and Christopher Gravley, Respondents,

and

Edwin Young and Barrett Maners, Intervenors,
Of whom Edwin Young and Barrett Maners are the Appellants.

MOTION TO BE RELIEVED AS COUNSEL FOR RESPONDENTS

YOU WILL PLEASE TAKE NOTICE THAT the undersigned hereby seeks to be relieved as counsel for Stephen H. Pettus and Christopher Gravley, Respondents. On August 11, 2020, Respondents hand-delivered to the undersigned the Motion to Relieve Counsel, attached as **Exhibit 1**. The undersigned disputes that she has committed any “ethical misconduct in regard to this case” but has no objection to being relieved as counsel.

At the time Respondents hand-delivered Exhibit 1, they stated to the undersigned that they intended to file the Motion to Relieve Counsel with the Court of Appeals later the same day. It thus appears that Respondents’ purpose is to discharge the undersigned

as their counsel. Accordingly, the undersigned respectfully requests that this Court permit her to be relieved as counsel for Respondents in this appeal on such terms as necessary, if any, to protect Respondents' interests.

The undersigned has consulted with counsel for Appellants, and he does not object to this Motion.



Kathleen McDaniel
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912 Lady Street, Second Floor
Columbia, South Carolina 29201
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kmcdaniel@burnetteshutt.law

Columbia, South Carolina

August 14, 2020

OTHER COUNSEL OF RECORD:

W. Keith Martens
HAMILTON MARTENS, LLC
P.O. Box 10940
Rock Hill, South Carolina 29731
803-329-7672

ATTORNEY FOR APPELLANTS

Exhibit 1

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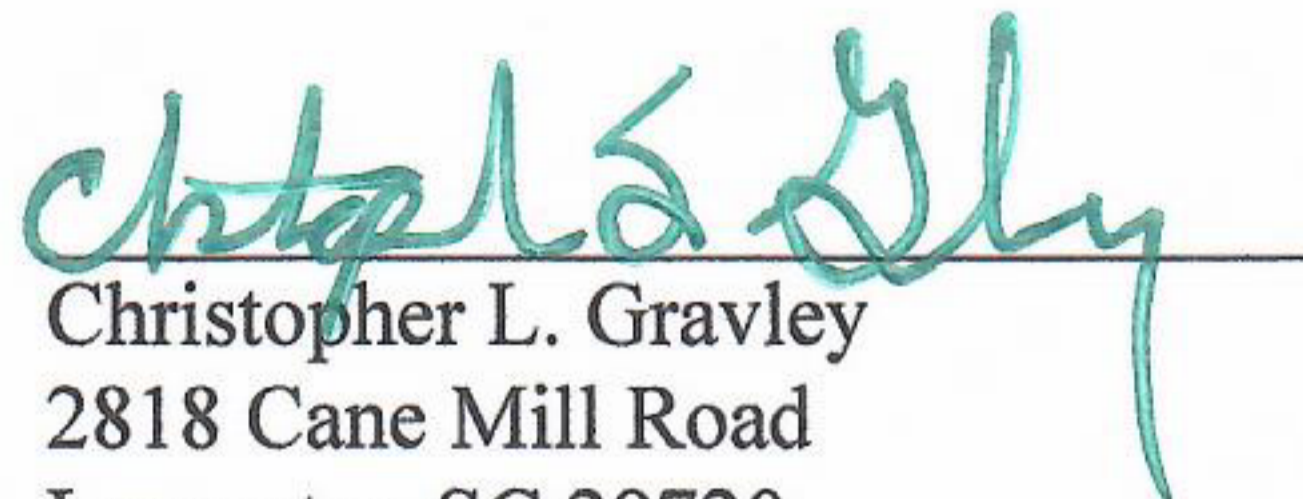
Of whom,

Edwin Young and Barrett Maners are theAppellants

Motion to Relieve Counsel

Notice is hereby given that Kathleen McColl McDaniel; Attorney for the Defendants/Respondents to be removed from Counsel immediately due to multiple issues including ethical misconduct in regard to the case.

August 10, 2020



Christopher L. Gravley
2818 Cane Mill Road
Lancaster, SC 29720
(803)577-5160
Defendants/Respondents

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PROOF OF SERVICE

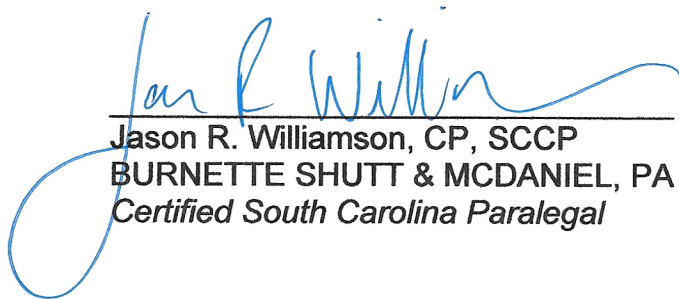
The undersigned certifies that he has served the Motion to be Relieved as Counsel for Respondents by depositing a copy of same in the United States Mail, postage prepaid, on the date below, addressed to the following:

W. Keith Martens, Esq.
HAMILTON MARTENS, LLC
PO Box 10940
Rock Hill, South Carolina 29731

ATTORNEYS FOR APPELLANTS

Stephen H. Pettus a/k/a
Stephen Pettus
Christopher Gravley
2818 Cane Mill Road
Lancaster, South Carolina 29720

RESPONDENTS


Jason R. Williamson, CP, SCCP
BURNETTE SHUTT & MCDANIEL, PA
Certified South Carolina Paralegal

Columbia, South Carolina

August 14, 2020



BURNETTE SHUTT MCDANIEL

Moving law forward.

Kathleen M. McDaniel – Partner

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August 14, 2020

VIA ONEDRIVE FOR BUSINESS

The Honorable Jenny Abbott Kitchings

Clerk, S.C. Court of Appeals

PO Box 11629

Columbia, South Carolina 29211

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SC Court of Appeals

**RE: Buffalo Creek Investments, Inc., Plaintiff v. Stephen H. Pettus a/k/a Stephen Pettus and Christopher Gravley, Respondents, and Edwin Young and Barrett Maners, Intervenors, of whom Edwin Young and Barrett Maners are the Appellants
Appellate Case No.: 2020-000952
BSM File No.: 19275.001**

Dear Madam Clerk:

Enclosed please find the Motion to be Relieved as Counsel for Respondents, in addition to the corresponding Proof of Service, for the above-referenced matter. Our accounting department will be sending you a check from this firm in the amount of \$50.00 for the filing fee associated with this filing.

Should you have any questions or concerns, please do not hesitate to let me know.

With kind regards, I am

Sincerely,

Kathleen M. McDaniel

KMM/jrw

Enclosures

cc: W. Keith Martens, Esq. (w/ encls.) (via US Mail only)
Stephen H. Pettus a/k/a Stephen Pettus (w/ encls.) (via US Mail only)
Christopher Gravley (w/ encls.) (via US Mail only)