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THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

SEP 03 2020

**SC Court of Appeals**

Joseph M. Strickland, Master-in-Equity Judge

APPELLATE CASE NO.: 2018-001156

Quality Lawn Care and Landscaping, Inc. d/b/a Design South Landscape Co.....Appellant.

v.

Coogler Construction Company, Inc .....Respondent,

**MOTION FOR SUBSTITUTION OF COUNSEL**

s/E. Wade Mullins, III  
E. Wade Mullins, III, SC Bar No. 3525  
Bruner Powell Wall & Mullins, LLC  
P. O. Box 61110  
Columbia, SC 29260  
(803) 252-7693  
[wmullins@brunerpowell.com](mailto:wmullins@brunerpowell.com)  
*Attorney for Respondent*

**MOTION FOR SUBSTITUTION OF COUNSEL**

Counsel for Respondent Coogler Construction Company, Inc. (“Respondent”), hereby move this Court, with client consent, for an order substituting counsel pursuant to Rules 240 and 264, SCA CR. Court records currently reflect that Respondent is represented by J. Croom Hunter and Steven R. Spreeuwers of Bruner, Powell, Wall & Mullins, LLC. J. Croom Hunter and Steven R. Spreeuwers have both left the employment of Bruner, Powell, Wall & Mullins, LLC and wish to be relieved as counsel for this appeal, and Respondent wishes to substitute E. Wade Mullins, III of Bruner, Powell, Wall & Mullins, LLC, as counsel in place of J. Croom Hunter and Steven R. Spreeuwers. Therefore, Respondent respectfully requests that the Court enter an order substituting E. Wade Mullins, III for J. Croom Hunter and Steven R. Spreeuwers as counsel for the Respondent.

**BRUNER, POWELL, WALL & MULLINS, LLC**

s/E. Wade Mullins, III  
E. Wade Mullins, III, SC Bar No. 3525  
Bruner Powell Wall & Mullins, LLC  
P. O. Box 61110  
Columbia, SC 29260  
(803) 252-7693  
[wmullins@brunerpowell.com](mailto:wmullins@brunerpowell.com)  
*Attorney for Respondent*

September 3, 2020  
Columbia, South Carolina

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Joseph M. Strickland, Special Circuit Court Judge

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Case No. 2016-CP-40-00642  
APPELLATE CASE NO. 2018-001156

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SC Court of Appeals

Quality Lawn Care and Landscaping, d/b/a Design South Landscape Co.....Appellant,

v.

Coogler Construction Company, Inc.....Respondent.

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PROOF OF SERVICE

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I, Lacey E. Segars, a paralegal of Bruner, Powell, Wall & Mullins, LLC, certify that I have served Appellant's counsel, T. Jeff Goodwyn, Jr., Esquire with a copy of *Motion for Substitution of Counsel for Respondent* by mailing a copy, postage paid, to:

T. Jeff Goodwyn, Jr., S.C. Bar No. 73789  
Goodwyn Law Firm, LLC  
2519 Devine Street, Suite A  
Columbia, SC 29205  
(803) 251-4517  
*Attorney for the Appellant*

*Lacey Segars*  
\_\_\_\_\_  
Lacey E. Segars

September 3, 2020

# BRUNER, POWELL, WALL & MULLINS, LLC

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WARREN C. POWELL, JR., P.A.\*  
HENRY P. WALL  
E. WADE MULLINS III, P.A.  
WESLEY D. PEEL, P.A.  
JOEY R. FLOYD, P.A.  
BENJAMIN C. BRUNER, P.A.

JAMES L. BRUNER (RETIRED)

CHELSEA J. CLARK  
ABIGAIL A. CARSON

\* ALSO ADMITTED IN DISTRICT OF COLUMBIA

AUTHOR'S E-MAIL: LSEGARS@BRUNERPOWELL.COM

September 3, 2020

**Via Hand Delivery**

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

**Re: Quality Lawn Care and Landscaping, Inc. d/b/a Design South Landscape Co.  
vs. Coogler Construction Company, Inc.  
Civil Action No. 2016-CP-40-00642  
Our File No. 7-617.127**

Dear Ms. Kitchings:

Please find enclosed a copy of the *Motion for Substitution of Counsel for Respondent* as well as a check for the filing fee and *Proof of Service* regarding the above referenced matter. I have uploaded the motion to the court's electronic filing system as well. If you should have any questions or concerns, please do not hesitate to contact me.

With my warmest regards, I am

Very truly yours,



Lacey E. Segars  
Paralegal to E. Wade Mullins, III

Enclosures

cc: T. Jeff Goodwyn, Jr., Esquire (Via U.S. Mail)

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SEP 03 2020  
SC Court of Appeals

**BRUNER, POWELL, WALL & MULLINS, LLC**

*A Professional Limited Liability Company*

**ATTORNEYS AND COUNSELORS AT LAW**

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**COLUMBIA, SOUTH CAROLINA 29260-1110**

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**SEP 03 2020**

**SC Court of Appeals**

**Via Hand Delivery**

**The Honorable Jenny Abbott Kitchings**

**Clerk of Court -The South Carolina Court of Appeals**

**1220 Senate Street**

**Columbia, SC 29201**