

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

RECEIVED

NOV 12 2020

The Honorable George M. McFaddin, Jr.

SC Court of Appeals

Case No. 2018-CP-18-01436
Appellate Case No. 2020-000985

MONICA BROWN-GANTT,..... Plaintiff/Appellant

v.

CENTEX REAL ESTATE COMPANY, LLC
and CENTEX HOMES, A NEVADA
GENERAL PARTNERSHIP.....Defendant/Respondent

And

CENTEX REAL ESTATE COMPANY, LLC
and CENTEX HOMES, A NEVADA
GENERAL PARTNERSHIP.....Third-Party Plaintiff

v.

FLOORS, INC. successor by merger to
RICE PLANTERS CARPETS, INC. subsequently
known as CREATIVE TOUCH INTERIORS, INC.
d/b/a/ HD SUPPLY INTERIOR SOLUTIONS and
now known as ISI DESIGN AND INSTALLATION
SOLUTIONS, INC., J.H. LEE MASONRY, INC. a/k/a
JAMES H. LEE MASONRY, INC., DVS, INC.,
MCDANIEL CONSTRUCTION CO., LLC a/k/a
MCDANIEL CONSTRUCTION, INC., and
ALL-AMERICAN ROOFING, INC.....Third-Party Defendants

Of which CENTEX REAL ESTATE COMPANY, LLC
and CENTEX HOMES, A NEVADA
GENERAL PARTNERSHIP are theRespondents

MOTION TO WITHDRAW AS COUNSEL

I, Taylor M. Morris, move for an Order of this Court withdrawing as attorney of record for Respondents, Centex Real Estate Company, LLC and Centex Homes, A Nevada General Partnership. The grounds for this Motion are that I, Taylor M. Morris, am leaving the firm of Parker Poe Adams and Bernstein, LLP effective November 13, 2020. Furthermore, Respondents will continue to be represented by Thomas C. Hildebrand, Jr. of the firm Parker Poe Adams and Bernstein, LLP and any other attorney from the firm of Parker Poe Adams and Bernstein, LLP that may make an appearance in this matter. I have obtained the consent of opposing counsel for this motion and opposing counsel is notified that any future communications, filings and briefs should continue to be served on Thomas C. Hildebrand, Jr. and any future attorneys that may make an appearance on behalf of Respondents.

The filing fee of \$50 associated with this Motion is being mailed to the South Carolina Court of Appeals.

PARKER POE ADAMS & BERNSTEIN LLP
200 Meeting Street, Suite 301
Charleston, SC 29401

By: s/ Taylor M. Morris

Taylor M. Morris
843.727.6315 (direct dial)
SC Bar #102552
taylormorris@parkerpoe.com

November 9, 2020

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
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The Honorable George M. McFaddin, Jr.

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MCDANIEL CONSTRUCTION CO., LLC a/k/a
MCDANIEL CONSTRUCTION, INC., and
ALL-AMERICAN ROOFING, INC.Third-Party Defendants

Of which CENTEX REAL ESTATE COMPANY, LLC
and CENTEX HOMES, A NEVADA
GENERAL PARTNERSHIP are theRespondents

PROOF OF SERVICE

I certify that I have served the Respondent's Motion to Withdraw as Counsel by electronic mail addressed to the following attorney of record:

William K. Kalivas
Smith Closser Wheeler, PA
PO Box 40578
Charleston, SC 29423-0578
wkalivas@scnlaw.com

PARKER POE ADAMS & BERNSTEIN LLP
200 Meeting Street, Suite 301
Charleston, SC 29401

By: s/ Taylor M. Morris

Taylor M. Morris
SC Bar #102552
843.727.6315 (direct dial)
taylormorris@parkerpoe.com

November 9, 2020

From: Will Kalivas
To: [Morris, Taylor M.](#)
Cc: [Heuss, Lauren A.](#)
Subject: Re: Brown v. Centex et al.//Motion to Withdraw as Counsel
Date: Friday, November 6, 2020 12:04:05 PM

Caution: External email

Taylor,

You absolutely have my consent and I wish you the best on your future endeavors. 2020 seems like a good time to make a change.

Best,

Will

On Fri, Nov 6, 2020 at 12:00 PM Morris, Taylor M. <taylormorris@parkerpoe.com> wrote:

Will:

Attached is my Motion to Withdraw as Counsel in the Brown v. Centex Court of Appeals matter. The reason for the Motion is that I am leaving Parker Poe next Friday, November 13. Tom (and whoever else he assigns to the case) will continue to represent the Centex entities in the appeal.

I am sending this email for two reasons. First, as proof of service pursuant to Supreme Court Order 2020-05-29-02. Second, to request your consent to the Motion. If you could advise whether you consent, I would greatly appreciate it.

Thank you in advance,

Taylor

Taylor Morris
Associate



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Office: 843.727.6315 | Fax: 843.727.2680 | [vcard](#) | [map](#)

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SC Court of Appeals

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Atlanta, GA
Charleston, SC
Charlotte, NC
Columbia, SC
Greenville, SC
Raleigh, NC
Spartanburg, SC

November 9, 2020

VIA US MAIL

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

RECEIVED
NOV 12 2020
SC Court of Appeals

Re: Monica Brown-Gantt, Appellant v. Centex Real Estate Company, LLC, and
Centex Homes, a Nevada General Partnership, Respondents et al.
Appellate Case No.: 2020-000985

Dear Ms. Kitchings:

Enclosed please find our firm's check in the amount of \$50 as payment for the Motion to Withdraw as Counsel in the above-referenced matter which was filed electronically today. I enclose a copy of the motion for your convenience. If you have any questions concerning this matter, please do not hesitate to contact me.

Sincerely,

Taylor M. Morris

TMM/lah
Enclosures

cc: William K. Kalivas, Esq.


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The Honorable Jenny Abbott Kitchings
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South Carolina Court of Appeals
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