

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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DEC 29 2020

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
L. Casey Manning, Circuit Court Judge

Appellate Case No. 2020-001189

South Carolina Coastal Conservation League, Inc., Elizabeth M. Smith and Abraham B. Jenkins,
Jr, and Plaintiffs/Appellants,

South Carolina Public Interest Foundation, Plaintiff,

v.

Charleston County, South Carolina; South Carolina Transportation Infrastructure Bank, and South
Carolina Department of Transportation, Respondents.

NOTICE OF WITHDRAWAL OF COUNSEL

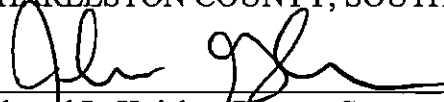
Bernard E. Ferrara, Jr., Deputy County Attorney
Johanna S. Gardner, Deputy County Attorney
Edward L. Knisley, Deputy County Attorney
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Lonnie Hamilton, III Public Services Building
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North Charleston, South Carolina 29405
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bferrara@charlestoncounty.org
jgardner@charlestoncounty.org
Attorneys for Respondent Charleston County, South
Carolina

Respondent Charleston County, South Carolina moves this Court for an Order allowing Joseph Dawson, III, to withdraw as counsel of record for it in this matter. The basis for this motion is that Joseph Dawson, III, will resign as the County Attorney because he has been nominated and confirmed as a U.S. District Court Judge for the District of South Carolina.

Respondent will not be prejudiced by this withdrawal because it will continue to be represented in this matter by Bernard E. Ferrara, Jr., Edward L. Knisley, Jr., and Johanna S. Gardner. Respondent requests that Joseph Dawson, III, be relieved as counsel and removed from the court roster in this matter.

Respectfully submitted,

CHARLESTON COUNTY, SOUTH CAROLINA



Edward L. Knisley, Deputy County Attorney
Bernard E. Ferrara, Jr., Deputy County Attorney
Johanna S. Gardner, Assistant County Attorney
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Attorneys for Respondent

Charleston, South Carolina
December 22, 2020

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v.

Charleston County, South Carolina; South Carolina Transportation Infrastructure Bank, and South
Carolina Department of Transportation, Respondents.

PROOF OF SERVICE

I certify that I have served the Notice of Withdrawal of Counsel and Notice of Appearance
upon the counsel of record as follows:

W. Andrew Gowder, Jr., Esquire
Austen & Gowder, LLC
1629 Meeting Street, Suite A
Charleston, South Carolina 29405

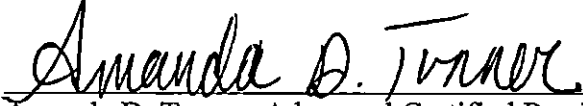
Christopher K. DeScherer, Esquire
Southern Environmental Law Center
525 East Bay Street, Suite 200
Charleston, South Carolina 29403

Linda C. McDonald, Esquire
South Carolina Department of Transportation
Post Office Box 191
Columbia, South Carolina, 29202

Robert E. Tyson, Esquire
Samuel J. Wellborn, Esquire
Jasmine D. Smith, Esquire
Robinson Gray Stepp & Laffitte, LLC
1310 Gadsden Street
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James G. Carpenter, Esquire
Carpenter Law Firm
819 East North Street
Greenville, South Carolina 29601

CHARLESTON COUNTY ATTORNEY'S OFFICE


Amanda D. Turner, Advanced Certified Paralegal



JOHANNA S. GARDNER
DEPUTY COUNTY ATTORNEY

CHARLESTON COUNTY ATTORNEY'S OFFICE
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December 22, 2020

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

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SC Court of Appeals

Re: South Carolina Coastal Conservation League, Inc.; Elizabeth M. Smith; Abraham B. Jenkins, Jr; and South Carolina Public Interest Foundation v. Charleston County, South Carolina; South Carolina Transportation Infrastructure Bank and South Carolina Department of Transportation
Appellate Case No. 20-001189

Dear Ms. Kitchings:

Enclosed for filing in the above referenced matter please find the original and seven copies of a Notice of Withdrawal of Counsel along with a Notice of Appearance in the above referenced appellate case. I would appreciate your acknowledging receipt of these documents by date-stamping the extra copies of the enclosed and returning them to me in the enclosed envelope.

By copy of this letter to all counsel, I am hereby serving a copy of this document. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

CHARLESTON COUNTY ATTORNEY'S OFFICE

Johanna S. Gardner

Enclosures

cc: Mr. W. Andrew Gowder, Jr., Esquire
Mr. Christopher Kaltman DeScherer, Esquire
Linda C. McDonald, Esquire
Robert E. Tyson, Jr., Esquire
James G. Carpenter, Esquire

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SC Court of Appeals

Honorable Jenny Abbott Kitchings
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