

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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**RECEIVED**  
**Feb 02 2021**  
SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell Scarborough  
Master-in-Equity

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Appellate Case No. 2018-001464

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Vanessa Williams, Vanessa Williams, as  
Conservator and Guardian of Sandra P. Perkins,  
and Vanessa Williams, as Personal Representative  
of the Estate of Sandra P. Perkins.....Respondent,

v.

Bradford Q. Jeffcoat, Jr. and  
Blue Heron Builders, Inc.....Defendants,  
*of whom*  
Bradford Q. Jeffcoat, Jr. is.....Appellant.

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CONSENT SUBSTITUTION OF COUNSEL

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Pursuant to Rule 264 of the South Carolina Appellate Court Rules, Respondent Vanessa Williams (“Respondent”) notifies this Court that it desires Timothy A. Domin, Esquire, of the law firm Clawson and Staubes, LLC to replace Andrew M. Sullivan, Esquire, also of the law firm Clawson and Staubes, LLC, as counsel of record for Respondent in this appeal. Attorney Drew Wenzel will remain as pro hac vice counsel for Respondent. Respondent requests that Andrew M. Sullivan, Esquire be allowed to withdraw as counsel of record. As indicated below, Andrew M. Sullivan, Esquire, Timothy A. Domin, Esquire, and Jason Scott Luck, Esquire, consent to this request.

Accordingly, Respondent, by and through undersigned counsel, requests that this Court order that Timothy A. Domin, be substituted as counsel of record for her in this appeal. Further, Respondent requests that Andrew M. Sullivan, Esquire, be relieved of any further representation and be removed from the court dockets in this matter.

**WE SO MOVE:**

CLAWSON and STAUBES, LLC

/s/ Timothy A. Domin

Timothy A. Domin, SC Bar No.: 65264  
126 Seven Farms Drive, Suite 200  
Charleston, South Carolina 29492-8144  
Phone: (843) 577 2026 Ext. 2221  
Fax: (843) 722-2867  
Email: tdomin@clawsonandstaubes.com

Drew Wenzel  
Caldwell Wenzel & Asthana, PC  
218 N. Alston St.  
Foley, AL 36535  
*Attorneys for Respondent*

**I SO CONSENT:**

CLAWSON and STAUBES, LLC

/s/ Andrew M. Sullivan

Andrew M. Sullivan, SC Bar No.: 100464  
1612 Marion Street, Suite 200  
Columbia, South Carolina 29201-2939  
Phone: (800) 774-8242  
Fax: (843) 722-2867  
Email: asullivan@clawsonandstaubes.com

**I SO CONSENT:**

/s/ Jason Scott Luck

Jason Scott Luck  
P.O. Box 47 (107 S. Parsonage St.)  
Bennettsville, SC 29512  
*Attorney for Appellant*

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v.

Bradford Q. Jeffcoat, Jr. and  
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*of whom*  
Bradford Q. Jeffcoat, Jr. is.....Appellant.

PROOF OF SERVICE

I certify that I have served the Consent Substitution of Counsel by depositing a copy of the same in the United States Mail, postage prepaid, on February 2, 2021 addressed to Appellant's attorney of record as follows:

Jason Scott Luck  
P.O. Box 47  
Bennettsville, SC 29512

  
\_\_\_\_\_  
Andy Blackwell  
Clawson and Staubes, LLC  
1612 Marion Street, Suite 200  
Columbia, SC29201



Andrew M. Sullivan  
Licensed in SC  
asullivan@clawsonandstaubes.com

February 2, 2021

File No.: 20152399.000

**VIA EMAIL ONLY**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

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Re: Vanessa Williams and Vanessa Williams as Conservator and Guardian of Sandra P. Perkins vs. Bradford Q. Jeffcoat and Blue Heron Builders, LLC  
Appellate Case No.: 2018-001464

Dear Ms. Kitchings:

Enclosed please find a Consent Substitution of Counsel in the above-referenced matter and the Proof of Service. Counsel for each party have consented to the substitution.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,

CLAWSON and STAUBES, LLC

*/s/Andrew M. Sullivan*

Andrew M. Sullivan

AMS/AMS

Enclosure

cc: Jason Scott Luck (via USPS and email)  
Timothy A. Domin (via email only)  
Drew Wenzel (via email only)