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**Apr 09 2021**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM FLORENCE COUNTY  
Court Of Common Pleas

The Honorable Michael G. Nettles, Judicial Circuit Court Judge  
Trial Court Case No.: 2017-CP-21-341

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Appellate Case No. 2018-001675

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Allstate Property and Casualty Insurance Company .....Respondent,

v.

Natoshia Hamilton and Kenneth Collins Coogler ..... Defendants,

Of Whom Natoshia Hamilton .....Appellant.

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MOTION TO WITHDRAW JANICE HOLMES AS COUNSEL  
FOR ALLSTATE PROPERTY AND CASUALTY INSURANCE COMPANY

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COMES NOW A. Johnston Cox as counsel for the Respondent, Allstate Property and Casualty Insurance Company (hereinafter "Allstate") and respectfully request that this Court withdraw Janice Holmes as counsel on behalf of Allstate in the above-captioned matter, pursuant to Rule 264(b), SCACR. Previously, and while employed at the firm of Gallivan White Boyd, P.A., Janice Holmes appeared on behalf of Respondent Allstate. Ms. Holmes has since left the firm. Upon withdrawal as counsel, Allstate shall continue to be represented by A. Johnston Cox of Gallivan White Boyd, P.A. It is the desire of Janice Holmes to be withdrawn as counsel, and Allstate has consented to the withdrawal as indicated on the attached **Exhibit A**. For

the foregoing reasons, the undersigned request that this Court enter an order withdrawing her appearance in this matter.

By: s/ Janice Holmes  
Janice Holmes (SC Bar No 75038)  
CLYDE & CO US LLP  
Four Embarcadero Center, Suite 1350  
San Francisco, CA 94111  
Telephone: 415-365-9846  
[Janice.Holmes@clydeco.us](mailto:Janice.Holmes@clydeco.us)

-and-

By: s/ A. Johnston Cox  
A. Johnston Cox (SC Bar No. 09081)  
GALLIVAN WHITE BOYD, P.A.  
1201 Main Street, Suite 1200  
Post Office Box 7368  
Columbia, South Carolina 29202  
Telephone: 803-779-1833  
Facsimile: 803-779-1767  
[jcox@GWBlawfirm.com](mailto:jcox@GWBlawfirm.com)

*Attorneys for Respondent  
Allstate Property and Casualty Insurance  
Company*

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**From:** Johnson, Paul (Palmetto MCO) <Paul.Johnson@allstate.com>  
**Sent:** Wednesday, April 7, 2021 8:47 AM  
**To:** Susan Book  
**Cc:** Johnston Cox; 'Janice.Holmes@clydeco.us'  
**Subject:** RE: Allstate v. Hamilton and Coogler 0356985366 [GWB-IMANMAIN.FID31944]

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Good Morning Susan,

You have Allstate's consent to remove Janice Holmes.

Thank you,

**Paul R Johnson**  
**Allstate Insurance Company**  
**Zone 4 Casualty Team 1500**  
**P.O. Box 660636**  
**Dallas Texas 75266**  
Direct: 803-213-3620  
Fax: 866-447-4293  
[Paul.Johnson@allstate.com](mailto:Paul.Johnson@allstate.com)

[Internal Information](#)

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**From:** Susan Book <[sbook@gwblawfirm.com](mailto:sbook@gwblawfirm.com)>  
**Sent:** Tuesday, April 06, 2021 2:29 PM  
**To:** Johnson, Paul (Palmetto MCO) <[Paul.Johnson@allstate.com](mailto:Paul.Johnson@allstate.com)>  
**Cc:** Johnston Cox <[jcox@gwblawfirm.com](mailto:jcox@gwblawfirm.com)>; 'Janice.Holmes@clydeco.us' <[Janice.Holmes@clydeco.us](mailto:Janice.Holmes@clydeco.us)>  
**Subject:** [External] Allstate v. Hamilton and Coogler 0356985366 [GWB-IMANMAIN.FID31944]

Good Afternoon,

As you are aware, Janice Holmes has left our firm and she therefore requests removal as counsel in this matter. Please reply with your consent that she may do so.

Thank you,



GALLIVAN WHITE BOYD

*Complex experience for complex matters*

**Susan Book**  
Paralegal  
sbook@gwblawfirm.com

**Gallivan, White & Boyd P.A.**  
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Of Whom Natoshia Hamilton ..... Appellant.

PROOF OF SERVICE

I certify that I served copies of the Motion to Withdraw Janice Holmes as Counsel for Allstate Property and Casualty Insurance Company by United States mail, postage prepaid, addressed to:

Eric M. Poulin, Esq., and Roy T. Willey, IV, Esq.  
Anastopoulo Law Firm, LLC  
32 Ann Street  
Charleston, S.C. 29403

April 9, 2021

By: s/ A. Johnston Cox  
A. Johnston Cox (S.C. Bar No. 09081)  
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