

**RECEIVED**  
**Apr 21 2021**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Honorable William H. Seals, Jr., Circuit Court Judge

Appellate Case No. 2018-000041

Case No. 2016-CP-26-00673

Case No. 2016-CP-26-00674

Case No. 2016-CP-26-00743

Case No. 2016-CP-26-00744

---

Jim Perkins, Colleen Franke a/k/a Colleen Franke Perkins, Mark Dos Santos, Nancy Moore, William Moore, Steve Dame, Errol Dos Santos, and Jeffrey Richardson, on behalf of themselves and all others similar situated..... Plaintiffs,

v.

Ocean Front Spa Horizontal Property Regimes, Inc., Bill Cameron, Walter Jordan, Ralph Jump, Stanley Jordan, Ray Coghill, and John Doe past board of directors of Ocean Front Spa Horizontal Property Regime, Inc., .....Defendants,

And

Jim Perkins, Colleen Franke a/k/a Colleen Franke Perkins, Mark Dos Santos, Nancy Moore, William Moore, Steve Dame, Errol Dos Santos, and Jeffrey Richardson, on behalf of themselves and all others similar situated..... Plaintiffs,

v.

The Myrtle Beach Homeowners Ass'n, Inc., Phil Cox, Bill Cameron, Stanley Jordan, Walter Jordan, Wayne Urban, Ken Perkins, and John Doe past board of directors of The Myrtle Beach Homeowners Ass'n, Inc., .....Defendants,

And

Jim Perkins, Colleen Franke a/k/a Colleen Franke Perkins, Mark Dos Santos, Nancy Moore, William Moore, Steve Dame, Errol Dos Santos, and Jeffrey Richardson, individually in their capacity as derivative shareholders ..... Plaintiffs,

v.

K.A. Diehl and Associates, Inc., The Myrtle Beach Homeowners Ass'n, Inc., Phil Cox, Bill Cameron, Stanley Jordan, Wayne Urban, Walter Jordan, Ken Perkins, and John Doe past board of directors of The Myrtle Beach Homeowners Ass'n, Inc., ..... Defendants,

And

Jim Perkins, Colleen Franke a/k/a Colleen Franke Perkins, Mark Dos Santos, Nancy Moore, William Moore, Steve Dame, Errol Dos Santos, and Jeffrey Richardson, individually in their capacity as derivative shareholders ..... Plaintiffs,

v.

Ocean Front Spa Horizontal Property Regimes, Inc., Walter Jordan, Ralph Jump, Ray Coghill, John Doe past board of directors of Ocean Front Spa Horizontal Property Regime, Inc., The Myrtle Beach Homeowners Ass'n, Inc., Phil Cox, Bill Cameron, Stanley Jordan, Wayne Urban, Ken Perkins, John Doe past board of directors of The Myrtle Beach Homeowners Ass'n, Inc., and K.A. Diehl and Associates, Inc., ..... Defendants,

Of whom Mark Dos Santos is the ..... Appellant,

And

Ocean Front Spa Horizontal Property Regimes, Inc., Walter Jordan, Ralph Jump, Ray Coghill, John Doe past board of directors of Ocean Front Spa Horizontal Property Regime, Inc., The Myrtle Beach Homeowners Ass'n, Inc., Phil Cox, Bill Cameron, Stanley Jordan, Wayne Urban, Ken Perkins, John Doe past board of directors of The Myrtle Beach Homeowners Ass'n, Inc., and K.A. Diehl and Associates, are the ..... Respondents.

---

MOTION TO WITHDRAW AS COUNSEL

---

Wm. Grayson Lambert hereby moves to withdraw as counsel of record for Respondent in this case, due to his departure from Burr & Forman LLP. Respondent will continue to be represented by the other counsel who have appeared in this case.

Respectfully Submitted,

s/Wm. Grayson Lambert  
Wm. Grayson Lambert  
S.C. Bar No. 101282  
BURR & FORMAN LLP  
Post Office Box 11390  
Columbia, S.C. 29211  
(803) 799-9800

April 21, 2021  
Columbia, SC

**RECEIVED**  
**Apr 21 2021**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Honorable William H. Seals, Jr., Circuit Court Judge

Appellate Case No. 2018-002009

Case No. 2015-CP-26-05573

---

K.A. Diehl and Associates, Inc., ..... Respondent,

v.

James Perkins, Colleen Franke a/k/a Colleen Franke  
Perkins, Mark Dos Santos, Nancy Moore, William Moore,  
Steven Dame, and Errol Dos Santos, ..... Defendants,

Of whom Mark dos Santos is the ..... Appellant.

---

CERTIFICATE OF SERVICE

---

This MOTION REGARDING ORAL ARGUMENT was served on all counsel of record via electronic mail, pursuant to Supreme Court Order 2020-03-20-01, § (g)(3), on April 21, 2021, and a copy of that electronic mail is attached to this certificate:

Kirby D. Shealy III  
kirby.shealy@arlaw.com  
ADAMS AND REESE LLP  
1501 Main Street, Fifth Floor  
Columbia, SC 29201

*Counsel for Appellant*

Philip A. Kilgore  
phillip.kilgore@ogletree.com  
Lucas J. Asper  
lucas.asper@ogletree.com  
OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.  
300 North Main Street, Suite 500  
Greenville, SC 29601

s/Wm. Grayson Lambert  
Wm. Grayson Lambert

## Lambert, Grayson

---

**From:** Lambert, Grayson  
**Sent:** Wednesday, April 21, 2021 10:07 AM  
**To:** 'kirby.shealy@arlaw.com'; 'phillip.kilgore@ogletree.com'; 'lucas.asper@ogletree.com'  
**Cc:** Thompson, Alicia; Golding, Henrietta  
**Subject:** Perkins v. Ocean Front - Motion to Withdraw  
**Attachments:** 2018-000041 - Motion to Withdraw.pdf

Gentlemen:

Please find attached my motion to withdraw as counsel of record in this case.

Regards,  
Grayson