

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

RECEIVED
AUG 02 2021
SC Court of Appeals

R. Markley Dennis, Jr., Judge of the South Carolina Business Court
Case No.: 2017-CP-26-04187

Appellate Case No.: 2021-000767

C. Barry Dykes and Barbara Eisenhardt, Individually and Derivatively On Behalf Of The Wild Wing Plantation Property Owners' Association, Inc.,.....Appellants,
v.

Wild Wing Company, LLC; Sunstar, LLC; Ralph R. Teal, Jr.; SLF IV/SBI Wild Wing, LLC; SLF IV/SBI JV, LLC; SLF IV/SBI Properties MM LLC; SLF IV/SBI Development Holdings, LLC; Wild Wing Residential Development, LLC; Stratford Land Manager, L.P. d/b/a Stratford Land; Stratford Land Fund IV, L.P.; SB Investments LLC; Realstar Management, LLC; Graeme T. Black; H. Gilford Edwards; Founders Wild Wing, LLC; Founders Group International, LLC; Dan Liu; Xian "Nick" Dou; Rick Schultz; Rick Taylor and Thomas Plankers,Respondents,

Wild Wing Plantation Owners' Association, Inc., Nominal Defendant.

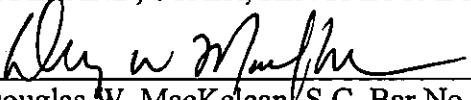
MOTION TO SUBSTITUTE COUNSEL

PLEASE TAKE NOTICE that counsel for *Respondents Ralph R. Teal, Jr.; Graeme T. Black; H. Gilford Edwards; and Nominal Defendant Wild Wing Plantation Owners' Association, Inc.*, in the above-captioned matter hereby move this Honorable Court, to transfer representation of *Respondents Ralph R. Teal, Jr.; Graeme T. Black; H. Gilford Edwards; and Nominal Defendant Wild Wing Plantation Owners' Association, Inc.*, within the firm of Copeland, Stair, Kingma & Lovell, LLP, from attorney Madison B. Suttie to attorney Skyler C. Wilson. Attorney Douglas W. MacKelcan will remain lead counsel for *Respondents Ralph R. Teal, Jr.; Graeme T.*

Black; H. Gilford Edwards; and Nominal Defendant Wild Wing Plantation Owners' Association, Inc. All future pleadings, motions, notices, discovery, and correspondence herein should be directed to the undersigned attorneys as counsel for *Respondents Ralph R. Teal, Jr.; Graeme T. Black; H. Gilford Edwards; and Nominal Defendant Wild Wing Plantation Owners' Association, Inc.*

This 29th day of July, 2021.

COPELAND, STAIR, KINGMA & LOVELL, LLP



Douglas W. MacKelcan/ S.C. Bar No.: 76332
Skyler C. Wilson: State Bar No.: 102865
40 Calhoun Street, Suite 400
Charleston, SC 29401
dmackelcan@cskl.law
swilson@cskl.law
Ph: (843) 727-0307

*Attorneys for Respondents Ralph R. Teal, Jr.;
Graeme T. Black; H. Gilford Edwards; and
Nominal Defendant Wild Wing Plantation
Owners' Association, Inc.*

STATE OF SOUTH CAROLINA

COUNTY OF HORRY

C. Barry Dykes and Barbara Eisenhardt,
individually and derivatively on behalf of the
Wild Wing Plantation Property Owners'
Association, Inc.,

Plaintiffs,

vs.

Wild Wing Company, LLC, Ralph R. Teal, Jr.,
SLV IV/SBI Wild Wing, LLC, Wild Wing
Residential Development LLC, Stratford Land
Manager, SB Investments LLC, Graeme T.
Black, H. Gilford Edwards, Founders Wild
Wing LLC, Founders Group International LLC,
Dan Liu and Xian Dou (Defendants) Wild Wing
Plantation Owners' Association, Inc.,

Defendants.

Wild Wing Plantation Owners' Association,
Inc.,

Nominal Defendant.

) IN THE COURT OF COMMON PLEAS
) FIFTEENTH JUDICIAL CIRCUIT
) CASE NO.: 2017-CP-26-04187

**NOTICE OF TRANSFER
WITHIN FIRM**

PLEASE TAKE NOTICE that representation of *Defendants Ralph R. Teal, Jr., Graeme T. Black, H. Gilford Edwards; and Wild Wing Plantation Owners' Association, Inc. (Nominal Defendant)*, in the above-captioned matter has been transferred within the firm of Copeland, Stair, Kingma & Lovell, LLP, from attorney William J. Farley, III to attorney Madison B. Suttie. Attorney Douglas W. MacKelcan will remain lead counsel for *Defendants Ralph R. Teal, Jr., Graeme T. Black, H. Gilford Edwards; and Wild Wing Plantation Owners' Association, Inc. (Nominal Defendant)*. All future pleadings, motions, notices, discovery, and correspondence herein should be directed to the undersigned attorneys as counsel for *Defendants Ralph R. Teal,*

Jr., Graeme T. Black, H. Gilford Edwards; and Wild Wing Plantation Owners' Association, Inc.
(Nominal Defendant).

This 11th day of September, 2019.

Respectfully submitted,

COPELAND, STAIR, KINGMA & LOVELL, LLP

By: *s/Douglas W. MacKelcan*
DOUGLAS W. MACKELCAN
State Bar No.: 76332
MADISON B. SUTTIE
State Bar No.: 101385

40 Calhoun Street, Suite 400
Charleston, South Carolina 29401-3531
dmackelcan@cskl.law
msuttie@cskl.law
Ph: 843-727-0307

*Attorneys for Defendants Ralph R. Teal, Jr.,
Graeme T. Black, H. Gilford Edwards; and
Wild Wing Plantation Owners' Association,
Inc. (Nominal Defendant)*

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

R. Markley Dennis, Jr., Judge of the South Carolina Business
Case No.: 2017-CP-26-04187

RECEIVED

AUG 02 2021

SC Court of Appeals

Appellate Case No.: 2021-000767

C. Barry Dykes and Barbara Eisenhardt, Individually and Derivatively On Behalf Of the Wild Wing Plantation Property Owners' Association, Inc.,.....Appellants,

v.

Wild Wing Company, LLC; Sunstar, LLC; Ralph R. Teal, Jr.; SLF IV/SBI Wild Wing, LLC; SLF IV/SBI JV, LLC; SLF IV/SBI Properties MM LLC; SLF IV/SBI Development Holdings, LLC; Wild Wing Residential Development, LLC; Stratford Land Manager, L.P. d/b/a Stratford Land; Stratford Land Fund IV, L.P.; SB Investments LLC; Realstar Management, LLC; Graeme T. Black; H. Gilford Edwards; Founders Wild Wing, LLC; Founders Group International, LLC; Dan Liu; Xian "Nick" Dou; Rick Schultz; Rick Taylor and Thomas Plankers,Respondents,

Wild Wing Plantation Owners' Association, Inc., Nominal Defendant.

PROOF OF SERVICE

I certify that I have served *Motion to Substitute Counsel* upon the parties below by electronic mail only, on the _____ day of July, 2021, addressed as follows:

Robert T. Lyles, Jr., Esq.
Lyles & Lyles, LLC
1037 Chuck Dawley Blvd., Ste. G100
Mt. Pleasant, SC 29464
rtl@lylesfirm.com
Counsel for Appellants

Eugene H. Matthews, Esq.
C. Cliff Rollins, Esq.
Richards Plowden & Robinson, P.A.
P.O. Drawer 7788
Columbia, SC 29202
gmatthews@RichardsonPlowden.com
crollins@RichardsonPlowden.com
*Counsel for Respondents Rick Shultz, Rick Taylor
and Thomas Plankers*

Scott F. Talley, Esq.
Tally Law Firm
134 Oakland Avenue
Spartanburg, SC 29302
scott@talleylawfirm.com
Counsel for Respondents

*Stratford Land Manager, LP d/b/a Stratford Land
and Stratford Land Fund IV, L.P.*

William Douglas Smith, Esq.
Johnson Smith Hibbard &
Wildman Law Firm, LLP
P.O. Drawer 5587
Spartanburg, SC 29304-5587
dsmith@jshwlaw.com
Counsel for Respondents


*Stratford Land Manager, LP d/b/a Stratford Land
and Stratford Land Fund IV, L.P.*

David B. Miller, Esq.
Zachary J. Crowl, Esq.
Bellamy LawFirm
P.O. Box 357
Myrtle Beach, SC 29578
DMiller@Bellamylaw.com
Zcrowl@Bellamylaw.com

*Counsel for Respondents Wild Wing Company, LLC; Sunstar, LLC; SLF IV/SBI Wild Wing, LLC;
SLF IV/SBI JV, LLC; SLF IV/SBI Properties MM, LLC; SLF IV/SBI Development Holdings, LLC;
Wild Wing Residential Development, LLC; Stratford Land Manager, L.P.; Stratford Land Fund IV,
L.P.; SB Investments, LLC; Realstar Management, LLC; Founders Wild Wing, LLC; Founders Group
International, LLC; and Dan Liu*

This 29th day of July, 2021.

COPELAND, STAIR, KINGMA & LOVELL, LLP


Douglas W. MacKelan: S.C. Bar No.: 76332
Skyler C. Wilson: State Bar No.: 102865
40 Calhoun Street, Suite 400
Charleston, SC 29401
dmackelcan@cskl.law
swilson@cskl.law
Ph: (843) 727-0307

*Attorneys for Respondents Ralph R. Teal, Jr.;
Graeme T. Black; H. Gilford Edwards; and
Nominal Defendant Wild Wing Plantation
Owners' Association, Inc.*

LAW OFFICES

COPELAND, STAIR, KINGMA & LOVELL, LLP

DOUGLAS W. MACKELCAN
Partner
SKYLER C. WILSON

DIRECT DIAL NUMBERS
(843) 266-8228
(843) 266-8221

E-MAIL ADDRESSES
dmackelcan@cskl.law
swilson@cskl.law

40 Calhoun Street, Suite 400
CHARLESTON, SC 29401

TELEPHONE (843) 727-0307

FAX (843) 727-2995

www.cskl.law

ATLANTA OFFICE

191 Peachtree Street, N.E.
Suite 3600
Atlanta, Georgia 30303-1740
(404) 522-8220

REPLY TO SC OFFICE

July 29, 2021

RECEIVED

AUG 02 2021

SC Court of Appeals

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

Re: C. Barry Dykes and Barbara Eisenhardt, individually and derivatively on behalf of the Wild Wing Plantation Property Owners' Association, Inc. v. Wild Wing Company, LLC, *et al.*
Appellate Case No.: 2021-000767
CSKL File No.: 4610-55732

Dear Ms. Kitchings:

Enclosed for filing, please find Respondents Ralph R. Teal, Jr., Graeme T. Black, and H. Gilford Edwards; and Nominal Defendant Wild Wing Plantation Owners' Association, Inc.'s Motion to Substitute Counsel regarding this case, substituting Attorney Skyler C. Wilson for Attorney Madison B. Suttie within the firm of Copeland, Stair, Kingma & Lovell, LLP. Please provided me with a date-stamped copy of the enclosed Motion, using the enclosed self-addressed, stamped envelope.

Please Note, Attorney William Joseph Farley, III is listed with this Court as counsel for Ralph R. Teal, Jr., Graeme T. Black, and H. Gilford Edwards; and Nominal Defendant Wild Wing Plantation Owners' Association, Inc. A *Notice of Transfer Within Firm* was filed with the Court of Common Pleas of Horry County on September 11, 2019 (see enclosed). However, Mr. Farley was not removed due to clerical error. Please remove Mr. Farley as counsel of record for this Appellate case.

By copy of this letter, the enclosed are provided to all counsel of record. If you have any questions or concerns, please do not hesitate to give me a call.

Sincerely,



DOUGLAS W. MACKELCAN
SKYLER C. WILSON

DWM:tjr
Enclosures

cc: (via email only): Robert T. Lyles, Jr., Esq.; Eugene H. Matthews, Esq.; C. Cliff Rollins, Esq.; Scott F. Talley, Esq.; William Douglas Smith, Esq.; David B. Miller, Esq.; Zachary J. Crowl, Esq.

rtl@lylesfirm.com; gmatthews@RichardsonPlowden.com; crollins@RichardsonPlowden.com; scott@talleylawfirm.com; dsmith@jshwlaw.com; DMiller@Bellamylaw.com; Zcrowl@Bellamylaw.com

FIRST-CLASS



PITNEY BOWES
US POSTAGE
02 1P \$ 001.40⁰
0001185568 JUL 29 2021
MAILED FROM ZIP CODE 29401

First Class Mail

CSKL

COPELAND STAIR
KINGMA & LOVELL

COPELAND, STAIR, KINGMA & LOVELL, LLP
40 Calhoun Street, Suite 400
Charleston, SC 29401-3531

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

RECEIVED

AUG 02 2021

SC Court of Appeals