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SEP 28 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM FLORENCE COUNTY
COURT OF COMMON PLEAS

MICHAEL G. NETTLES, CIRCUIT COURT JUDGE

APPELLATE CASE NO.: 2020-000614

James Marlowe and Lori Marlowe, individually, and as Next Friends of K.P., H.M., and B.M., Minors under the age of Eighteen (18) years,

Appellants,

v.

South Carolina Department of Transportation,

Respondent.

APPELLANTS' MOTION FOR TRANSFER WITHIN FIRM

YOU WILL PLEASE TAKE NOTICE that the Appellants, James Marlowe and Lori Marlowe, individually and as Next Friends of K.P., H.M., and B.M., minors under the age of Eighteen (18) years, by and through their undersigned counsel, will move to have this matter transferred within the firm of Hopkins Law Firm. LLC from William E. Hopkins, Jr., Esquire to J. Clay Hopkins, Esquire. As a result of this transfer, William E. Hopkins, Jr., Esquire should be removed from receiving future notices regarding this matter.

THEREFORE, please direct all future communications, pleadings, motions and notices to **J. Clay Hopkins, Esquire.**

HOPKINS LAW FIRM, L.L.C.

s/ J. Clay Hopkins

J. Clay Hopkins (SC Bar No. 102053)

clay@hopkinsfirm.com

12019 Ocean Highway

Post Office Box 1885

Pawleys Island, South Carolina 29585

(843) 314-4202 – Telephone

(843) 314-9365 – Facsimile

Attorney for Appellants

Pawleys Island, South Carolina
September 21, 2021

Other Counsel of Record:

John B. McCutcheon, Jr.

S. Ashley Gwin

THOMPSON & HENRY, PA

Post Office Box 1740

Conway, South Carolina 29528

(843) 248-5741 – Telephone

Attorneys for Respondent

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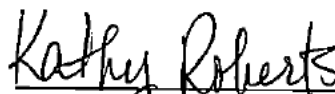
South Carolina Department of Transportation,

Respondent.

PROOF OF SERVICE

I, Kathryn Y. Roberts, hereby certify that on September 21, 2021, I caused a true and correct copy of the **Appellants' Motion for Transfer Within Firm** in the above captioned action to be served on all counsel of record via email and regular U.S. Mail, postage pre-paid, addressed as follows:

John B. McCutcheon, Jr., Esquire
S. Ashley Gwin, Esquire
THOMPSON & HENRY, PA
Post Office Box 1740
Conway, South Carolina 29528


Kathryn Y. Roberts

Pawleys Island, South Carolina

HOPKINS LAW FIRM, LLC
12019 OCEAN HIGHWAY
POST OFFICE BOX 1885
PAWLEYS ISLAND, SOUTH CAROLINA 29585
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J. CLAY HOPKINS
J. RYAN HEISKELL*

*ALSO ADMITTED IN
DISTRICT OF COLUMBIA

September 21, 2021

CHARLESTON OFFICE
171 CHURCH STREET, SUITE 160
CHARLESTON, SOUTH CAROLINA 29401
TELEPHONE: 843-314-4202
FACSIMILE: 843-314-9365

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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SC Court of Appeals

Re: James Marlowe and Lori Marlowe, individually and as Next Friends of K.P.,
H.M., and B.M., minors under the age of Eighteen (18) years v. South
Carolina Department of Transportation
Appellate Case No.: 2020-000614

Dear Ms. Kitchings:

Please find enclosed the original and one copy of the Appellants' Motion for Transfer Within Firm and Proof of Service in the above referenced matter. Also enclosed is our firm's check for \$50 for the filing fee. Please file the original Motion and return a clocked copy to me in the enclosed self-addressed, stamped envelope.

By copy of this letter, I am serving a copy of the Motion on counsel for Respondent.

Thank you for your assistance.

Sincerely,

HOPKINS LAW FIRM, LLC



Kathryn Y. Roberts
Litigation Paralegal

/kyr
Enclosures

cc: John B. McCutcheon, Esquire
S. Ashley Gwin, Esquire
James and Lori Marlowe

HOPKINS LAW FIRM, LLC

POST OFFICE Box 1885

PAWLEYS ISLAND, SOUTH CAROLINA 29585

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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