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OCT 06 2021

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Bentley D. Price

Appellate Case No. 2021-000100
Common Pleas Case No.: 2019-CP-10-06058

Bay Light, LLC.....Respondent,

vs.

Westgate Office Park Landowner Maintenance Association, Inc.....Appellant.

NOTICE OF APPEARANCE AND MOTION FOR SUBSTITUTION OF COUNSEL

TO: ALL PARTIES AND THE COURT OF APPEALS:

NOW COMES Stan Barnett, Attorney at Law, and gives notice of his appearance as counsel for Respondent in the above-referenced action and moves on behalf of Respondent, Bay Light, LLC to be substituted as counsel for Respondent to replace of G. Thomas Hill of Hill & Hill, LLC. Respondent has specifically directed Mr. Hill to withdraw as counsel and counsel signing below has attempted without success to secure Mr. Hill's express consent for his withdrawal. The only means, therefore, to affect the express intent of Respondent is through this Motion. Mr. Barnett hereby requests that all pleadings, motions, notices and correspondence and other papers relating to the above-captioned action be sent to Stan Barnett at the address listed below.

This 5th day of October 2021.

Respectfully submitted,

s/ Stan Barnett

Stan Barnett (SC Bar # 00533)

305 North Civitas Street

Mount Pleasant, South Carolina 29464

(843) 708-4887

stan.barnett@yahoo.com

Counsel for Respondent

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PROOF OF SERVICE

I certify that I have served the Notice of Appearance and Motion for Substitution of Counsel by depositing a copy in the United States Mail postage prepaid, on October 5, 2021 addressed to:

Ms. Terri Southard
Bay Light, LLC
1925 Savannah Highway
Charleston, SC 29407

RESPONDENT

G. Thomas Hill, Esquire
HILL & HILL, LLC
6209 Savannah Highway
Ravenel, SC 29470
843-889-2262
Hillpdq1@gmail.com

Erika V. Harrison, Esquire
Law Offices of Erika V. Harrison
P.O. Box 20956
Charleston, SC 29413
(843) 302-1900
erika@erikaharrison.com

ATTORNEY FOR APPELLANT

s/ Stan Barnett

Stan Barnett (SC Bar # 00533)

305 North Civitas Street

Mount Pleasant, South Carolina 29464

(843) 708-4887

stan.barnett@yahoo.com

October 5, 2021

Mount Pleasant, South Carolina

STAN BARNETT

Attorney at Law
305 North Civitas Street
Mount Pleasant, South Carolina 29464
(843)708-4887
stan.barnett@yahoo.com

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SC Court of Appeals

October 5, 2021

The Honorable Jenny Abbott Kitchings
Clerk, S.C. Court of Appeals
1220 Senate Street
Columbia, S.C. 29201

RE: Bay Light, LLC v. Westgate Office Park Landowners Maintenance Asso., Inc.
Appellate Case No.: 2021-000100

Dear Ms Kitchings:

Enclosed please find the original and one (1) copy of a Notice of Appearance and Motion for Substitution of Counsel and Proof of Service in regard to the above-referenced matter. In addition, please find my check in the amount of \$50.00 representing the filing fee. Please file the original, file stamp the copy, and return the file-stamped copy to me in the self-addressed, stamped envelope provided.

By copy of this correspondence, I am serving the same upon counsel for Appellant and G. Thomas Hill, Esquire.

With kindest regards and appreciation, I remain

Sincerely,



Stan Barnett

Cc: Ms. Terri Southard
Erika V. Harrison, Esq.
G. Thomas Hill, Esq.

Stan Barnett
305 North Civitas Street
Mount Pleasant, SC 29464

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk, S.C. Court of Appeals
1220 Senate Street
Columbia, S.C. 29201

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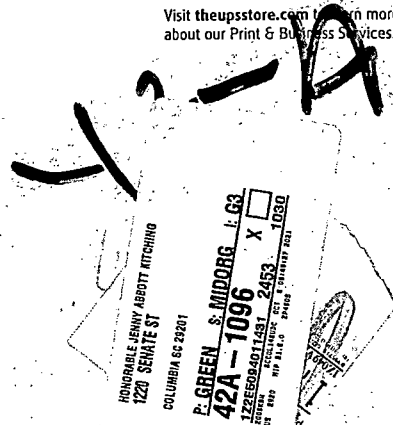
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DATE OF LAST CASE

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COLUMBIA SC 29201-3769

SC 292 9-01

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