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Oct 19 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Eugene C. Griffith, Jr., Circuit Court Judge

Appellate Case No. 2019-000728

National Trust for Historic Preservation in the United States and the
City of Charleston Respondents/Appellants,

v.

City of North CharlestonAppellant/Respondent.

PETITION TO WITHDRAW AND TO SUBSTITUE COUNSEL

In accordance with the provisions of Rule 264(b), SCACR, the Respondent/Appellant National Trust for Historic Preservation in the United States (the “National Trust”) seeks an Order of this Honorable Court, allowing William Jackson Cook to withdraw from representation of the National Trust and allowing the substitution of Anne Elizabeth Nelson, *pro hac vice*, as other counsel of record for the National Trust.

In support of the requested relief, Petitioner would show as follows:

1. Mr. Cook served as counsel of record for the National Trust in association with the National Trust’s principal counsel of record, G. Trenholm Walker of Walker Gressette Freeman & Linton, LLC. During that time Mr. Cook was employed by the National Trust. Mr. Cook is no longer employed by the National Trust, is no longer involved in this matter, and seeks to withdraw as counsel of record in this appeal.
2. On or about October 15, 2019, this Court approved the admission of Anne (incorrectly identified as Amy) Elizabeth Nelson, *pro hac vice*, to serve as associate counsel of record for the National Trust in this appeal. A copy of the order approving her admission is attached as Exhibit 1 hereto.
3. The National Trust consents to the withdrawal of Mr. Cook and seeks to substitute Ms. Nelson as associate counsel for the National Trust in this appeal.

4. Granting the relief Petitioner seeks will not disrupt the National Trust's representation or delay in any manner prosecution of the pending appeal.

WHEREFORE, for the reasons stated in this Petition, the undersigned counsel requests this Honorable Court to issue an Order approving the withdrawal of representation of William J. Cook and the substitution of Anne Elizabeth Nelson as associate counsel for the National Trust in this appeal.

Respectfully submitted, this the 15th day of October 2021.



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Attorneys for Respondent/Appellant
National Trust for Historic Preservation in
the United States

I hereby consent to and join in the petition to withdraw as attorney of record in this matter.

Date: October 19, 2021



William Jackson Cook (SC Bar #12183)
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National Trust for Historic Preservation in the United States and the
City of Charleston Respondents/Appellants,

v.

City of North CharlestonAppellant/Respondent.

CERTIFICATE OF SERVICE

I certify that I have served the **PETITION TO WITHDRAW AS COUNSEL and
SUBSTITUE COUNSEL**, by electronic mail, on October 19, 2021, addressed to the attorneys of
record:

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October 19, 2021

Electronic Mail and U.S. Mail

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
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RECEIVED
Oct 19 2021
SC Court of Appeals

Re: National Trust for Historic Preservation in the United States and City of Charleston v. City of North Charleston, Case No. 2018-CP-10-0851
Appellate Case No. 2019-000728
WGFL File No. : 8081-001

Dear Ms. Kitchings:

Attached for filing please find the Petition of William Jackson Cook to Withdraw as Counsel and to Substitute Anne Elizabeth Nelson (previously and incorrectly referred to as Amy Elizabeth Nelson) for Respondent/Appellant National Trust with proof of service. Enclosed with this letter is the filing fee of \$50. All other counsel of record consent to Mr. Cook's withdrawal.

Thank you for filing the enclosure with the Court. With kind regards, I am,

Very truly yours,

WALKER, GRESSETTE, FREEMAN, & LINTON, LLC

G. Trenholm Walker

Enclosure (As Stated)

c: J. Brady Hair, Esq. (E-mail only)
Derk Van Raalte, Esq. (E-mail only)
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