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**Nov 29 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

Appellate Case No. 2021-000585

Ana Rodriguez Galvan,  
Employee.....Respondent,

v.

Griffin Stafford North Charleston, Employer; Accident Fund General Insurance Company c/o  
Accident Fund Insurance Company of America, Hartford Accident & Indemnity Co., and  
Employers Preferred Insurance Company, Carrier, Defendants

Of whom, Griffin Stafford North Charleston, Employer and Employers Preferred Insurance  
Company, Carrier, are the Appellants

And

Accident Fund General Insurance Company c/o Accident Fund Insurance Company of America  
and Hartford Accident & Indemnity Co.

.....Respondents

MOTION FOR SUBSTITUTION OF COUNSEL FOR RESPONDENTS GRIFFIN STAFFORD  
NORTH CHARLESTON AND  
HARTFORD ACCIDENT & INDEMNITY CO.

Respondents Griffin Stafford North Charleston and Hartford Accident & Indemnity Co.,  
by and through their undersigned counsel and pursuant to Rule 240, SCACR, hereby move this  
honorable court for an Order (1) substituting in Andrew T. Smith, Esquire of Willson Jones Carter  
& Baxley, P.A. as counsel of record for Respondents, (2) relieving Michael W. Burkett, Esquire,  
J. Gabriel Coggiola, Esquire, and Alexa M. Tattersall, Esquire of Willson Jones Carter & Baxley,  
P.A. as counsel of record for Respondents, and (3) maintaining Lynnley D. Ross, Esquire as

counsel of record for Respondents. All counsel of record for Respondents Griffin Stafford North Charleston and Hartford Accident & Indemnity Co. consent to this Motion.



Lynnley D. Ross  
Willson Jones Carter & Baxley, P.A.  
4922 O'Hear Ave., Suite 301  
North Charleston, SC 29405

Attorney for Respondents Griffin  
Stafford North Charleston and Hartford  
Accident & Indemnity Co.

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Of whom, Griffin Stafford North Charleston, Employer and Employers Preferred Insurance  
Company, Carrier, are the Appellants

And

Accident Fund General Insurance Company c/o Accident Fund Insurance Company of America  
and Hartford Accident & Indemnity Co.

.....Respondents

PROOF OF SERVICE

I hereby certify that I have served Respondents' Motion for Substitution of Counsel by depositing  
a copy in the United States Mail, as well as e-mail, postage prepaid, on November 29, 2021  
addressed to the attorneys of record:

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North Charleston, SC 29405

Attorneys for Respondents Griffin  
Stafford North Charleston and Hartford  
Accident & Indemnity Co.

North Charleston, South Carolina



willson jones  
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November 29, 2021

**Via Email and Certified Mail**

The Honorable Jenny Abott Kitchings  
Clerk of the South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, South Carolina 29211

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**SC Court of Appeals**

Re: Ana Rodriguez Galvan vs. Griffin Stafford N. Charleston  
Appellate Case No.: 2021-000585  
WCC File No.: 1515209 DOI: 10/9/2015  
Carrier: Hartford Accident & Indemnity Company - Claim No.: Y97C00172  
WJCB File No.: 0100.03662

Dear Ms. Kitchings:

Please find enclosed the original and one (1) copy of Respondents' Motion for Substitution of Counsel in the above-referenced matter along with the \$50.00 filing fee. I would appreciate you filing the original Motion for Substitution of Counsel and returning a clocked copy of the same to my office in the pre-paid envelope enclosed. By copy of this correspondence and enclosures to all interested parties, I am serving them with a copy of Respondents' Motion for Substitution of Counsel.

With kindest regards,  
**WILLSON JONES CARTER & BAXLEY, P.A.**



Lynnley D. Ross

Enc: Motion for Substitution of Counsel  
Cc: Michael J. Jordan, Esquire  
Regan A. Cobb, Esquire  
F. Elliotte Quinn, IV, Esquire  
Kathryn Walton, Esquire