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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION
Commissioner Susan S. Barden

Workers' Compensation Case No: 1520443
Appellate Case No. 2021-001332

Melissa Mcknight, Appellant.

v.

McCall Farms, INC. & Great American Insurance Company of New York c/o Strategic Comp Services..... Respondents.

MOTION TO BE RELIEVED AS COUNSEL OF RECORD AND FOR AN EXTENSION OF TIME FOR APPELLANT TO SERVE AND FILE INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

Pursuant to Rules 240 and 264(b), SCACR, the undersigned attorney of record for Appellant, Ian D. Maguire, Esquire of the Maguire Law Firm, moves for an order relieving him as counsel in this matter. The grounds for this motion are that professional considerations require termination of the representation, that good cause exists to end the representation, and that the contract between Appellant and Ian D. Maguire, Esquire permits the withdrawal.

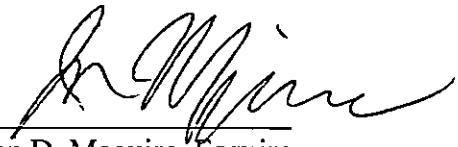
In order to protect the interests of the Appellant, the undersigned further requests an extension of time to serve and file Appellant's Initial Brief and Designation of Matter to be included in the Records on Appeal. Appellant is informed and believes that her deadline to file her Initial Brief and Designation of Matter would be December 8, 2021. Appellate is seeking an additional sixty (60) days to file these documents in order to secure alternate legal counsel. A sixty (60) day extension of time will not prejudice the rights of any of the parties. Counsel for all parties to this case have been notified of Appellant's intent to file this motion. Granting this motion would require the Initial Brief and Designation of Matter to be filed with the Court no later than February 6, 2022.

Notice was provided to Appellant on October 29, 2021 that this Motion would be filed after serving the Notice of Appeal on her behalf.

For these reasons, Ian D. Maguire, Esquire requests an Order relieving him as counsel and an extension of the deadline for filing and serving the Initial Brief and Designation of Matter until February 6, 2022 on behalf of the Appellant.

November 24, 2021

Signature Page Follows



Ian D. Maguire, Esquire

SC Bar No. 66587

MAGUIRE LAW FIRM

1600 North Oak Street, Suite B

Myrtle Beach, SC 29577

(843) 361-7549

Attorney for Appellant

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Workers' Compensation Case No: 1520443
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Melissa Mcknight, Appellant.

v.

McCall Farms, INC. & Great American Insurance Company of New York c/o Strategic Comp Services..... Respondents.

PROOF OF SERVICE

I, the undersigned, of Maguire Law Firm, certify that I have served the foregoing documents this 24th day of November 2021 via electronic service to the following individuals at the following address:

Documents Served:

- **Motion to be Relieved as Counsel and for an Extension of Time for Appellant to Serve and File Initial Brief and Designation of Matter to be included in the Record on Appeal**

Individuals Served:

Walter Barefoot, Esquire
Helen Hiser, Esquire
1452 West Evans Street Suite 102
Florence SC 29501
(843) 579-1801
Attorney for Respondents McCall Farms, INC
& Great American Insurance Company of New York c/o Strategic Comp Services.
walt.barefoot@mgclaw.com
helen.hiser@mgclaw.com

Melissa Mcknight
2106 Abernathy Drive
Florence, SC 29505
Melissamcknight64@yahoo.com

Signature Page Follows



Megan Demarest

Paralegal to Ian D. Maguire, Esquire

MAGUIRE LAW FIRM

1600 North Oak Street, Suite B

Myrtle Beach, SC 29577

(843) 361-7549

megan@maguirelawfirm.com



*Ian D. Maguire**
Brooke Eaves Wright
Brittney E. Jones
Tiffany K. Buffkin

**Licensed in North & South Carolina*

MEGAN DEMOREST
MEGAN@MAGUIRELAWFIRM.COM

November 24, 2021

VIA CERTIFIED MAIL:

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

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SC Court of Appeals

RE: Melissa McKnight v. McCall Farms, INC.

Carrier: Great American Insurance Company of New York
c/o Strategic Comp Services

Appellate Case No.: 2021-001332

Dear Ms. Kitchings:

Please find enclosed herein the original and seven (7) copies of Appellant's Attorney's Motion to be Relieved as Counsel and for an Extension of Time for Appellant to Serve and File Initial Brief and Designation of Matter. Also enclosed, please find a check in the amount of \$50.00 for the applicable filing fee for this Motion. Please file stamp the extra copy and return the same to our office in the enclosed self-addressed stamped envelope.

By copy of this correspondence I am notifying counsel of record of this communication with the Court.

With kind regards, I am,
Sincerely,

Megan Demorest
Paralegal for Ian D. Maguire, Esquire

Enclosures

Cc: Melissa Mcknight
Walter H. Barefoot, Esquire
Helen Hiser, Esquire

ORIGIN ID:MYRLA (843) 301-7549
ION MARJORIE
MARJORIE LAW FIRM
1000 NORTH OAK STREET SUITE B

SHIP DATE: 24NOV21
ACT WGT: 1.00 LB
CAD: 108520750/NET4400

MYRTLE BEACH, SC 29577
UNITED STATES US

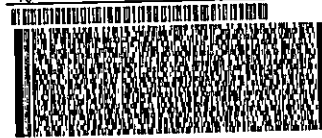
BILL SENDER

TO THE HONORABLE JENNY ABBOTT KITCHING
SOUTH CAROLINA COURT OF APPEALS
1220 SENATE STREET

COLUMBIA SC 29201

(843) 301-7549
REF.

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