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**Jan 31 2022**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM COURT OF COMMON PLEAS  
RICHLAND COUNTY

Appeal No: 2019-000148

Tymika Jones Alston and Harold Alston individually  
And as Parents and Guardians on behalf of their minor child, J.A.,..... Appellants,

v.

Donald Richard Torres d/b/a DMT Construction Co., Inc.,  
L&L Electric, Inc. and Eduardo Moreno d/b/a  
E.S. Moreno Construction, Defendants,  
Of which Donald Richard Torres d/b/a/ DMT  
Construction Co., Inc., is the .....Respondent.

**MOTION TO ALLOW  
WITHDRAWAL OF REPRESENTATION**

Pursuant to Rules 240 and 264(b), SCACR, Respondent Donald Richard Torres d/b/a DMT Construction Co., Inc. hereby moves this Court to allow Geoffrey W. Gibbon to withdraw from representation of Respondent in the above-captioned appeal. Mr. Gibbon is no longer with McAngus Goudelock & Courie. The undersigned and Robert L. Mebane, Jr., who is noticing his appearance, will continue to represent Respondent Donald Richard Torres d/b/a DMT Construction Co., Inc. in this appeal.

[SIGNATURE ON FOLLOWING PAGE]

January 31, 2022

Respectfully submitted,

MCANGUS GOUDELICK & COURIE, LLC



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Helen F. Hiser, S.C. Bar No.: 76124  
P.O. Box 650007  
Mount Pleasant, South Carolina 29465  
(843) 576-2900  
helen.hiser@mgclaw.com  
*Counsel for Respondent Donald Richard Torres  
d/b/a DMT Construction Co., Inc.*

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E.S. Moreno Construction, Defendants,

Of which Donald Richard Torres d/b/a/ DMT  
Construction Co., Inc., is the .....Respondent.

**PROOF OF SERVICE**

I certify that on the 31st day of January 2022, I served Respondent's **Motion to Allow Withdrawal of Counsel** on Tymika Jones Alston and Harold Alston individually and as Parents and Guardians on behalf of their minor child by depositing a copy of it in the United States Mail, postage prepaid, addressed to their attorney of record:

Donald Gist  
Aaron Wallace  
Gist Law Firm, PA  
P.O. Box 30007  
Columbia, South Carolina 29230

s/Helen F. Hiser  
Helen F. Hiser  
McAngus, Goudelock & Courie LLC  
735 Johnnie Dodds Blvd., Suite 200  
P.O. Box 650007  
Mount Pleasant, South Carolina 29465  
(843) 576-2900  
*Attorneys for Respondent Donald Richard Torres  
d/b/a DMT Construction Co., Inc.*

**mgc**

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**Reply To**

HELEN F. HISER  
Direct Dial: (843) 576-2930  
helen.hiser@mgclaw.com

January 31, 2022

**VIA S.C. COURTS E-FILING & U.S. MAIL**

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

RE: Tymika Jones Alston and Harold Alston individually and as Parents and Guardians on behalf of their minor child Jayden Alston vs. Donald Richard Torres d/b/a DMT Construction, Co., Inc., L&L Electric Inc. and Eduardo Moreno d/b/a E.S. Moreno Construction  
Civil Action No.: 2012-CP-40-06895R (Richland)  
Carrier Claim No.: MPI80262  
MGC File No.: 20362.11008  
Appeal No.: 2019-000148

Dear Ms. Kitchings:

Enclosed please find Respondent's Motion to Allow Withdrawal of Representation, and the Proof of Service in the above-referenced matter. We will send our firm's check in the amount of \$50 for filing the motion via U.S. Mail with the original of the Motion.

If you have any questions, please do not hesitate to contact me.

Very truly yours,



Helen F. Hiser

Enclosure

cc: Donald Gist, Esq.  
Arron Wallace, Esq.