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Mar 08 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM THE COURT OF COMMON PLEAS

WILLIAMSBURG COUNTY

George M. McFaddin, Jr. Circuit Court Judge

Case No.: 2016-CP-45-00590, Circuit Court
Appeals Court Docket No.: 2021-000849

Cassandra Selph..... Appellant,

v.

Barbara Boatwright, Margaret S. Daniels, Individually
and as Personal Representative of The Estate of Eli Selph,
Eli Maurice Selph, and Dwayne Selph

Of whom Margaret S. Daniels, Individually and as Personal Representative of the Estate of Eli
Selph, and Dwayne Selph Respondents.

**NOTICE OF MOTION AND MOTION FOR SUBSTITUTION OF COUNSEL FOR
RESPONDENT MARGARET S. DANIELS**

Respondent Margaret S. Daniels (“Respondent”), by and through counsel, hereby move for the substitution of her attorney of record for in the above-captioned action. Respondent requests removal of Mr. Jerome P. Askins, III (SC Bar# 433) as attorney of record and request the addition of Mr. Charles J. Boykin (SC Bar #65149), Mr. Kenneth A. Davis (SC Bar #66416) and Mr. Peter E. Keup (SC Bar #78383) to serve as Respondents’ counsel in this matter. All of these attorneys are admitted and licensed to practice in this court.

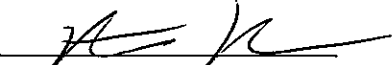
The following Respondent hereby consents to the substitution of counsel pursuant to SC Court of Appeals Rule 9(d)(1).


Margaret S. Daniels

[SIGNATURE ON NEXT PAGE]

Respectfully submitted

Boykin & Davis, LLC

By: 
Charles J. Boykin (SC Bar #65149)
Kenneth A. Davis (SC Bar #66416)
Peter E. Keup (SC Bar #78383)

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Attorneys for Respondent Margaret S.
Daniels

March 8, 2022
Columbia, South Carolina

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Of whom Margaret S. Daniels, Individually and as Personal Representative of the Estate of Eli
Selph, and Dwayne Selph Respondents.

PROOF OF SERVICE

I certify that I have served the **NOTICE OF MOTION AND MOTION FOR
SUBSTITUTION OF COUNSEL FOR RESPONDENT MARGARET S. DANIELS** on
Respondent’s Attorneys of record and on Appellant’s attorney of record listed below, by
depositing a copy of it in the United States Mail, postage prepaid, on March 8, 2022, addressed to:

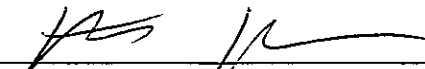
Jerome P. Askins, III Esq. (SC Bar# 433)
307 E. Broad Street
Hemingway, SC 29544
For Respondent Margaret S. Daniels

Bernard Mitchell Alter, Esq
Alter And Barbaro
26 Court St., Ste. 1812
Brooklyn, NY 11242-1118
For Appellant Cassandra Selph

Gary W. Crawford, Esq. (SC Bar #1459)
P.O. Box 508
Florence, SC 29503
For Respondent Dwayne Selph

[SIGNATURE ON NEXT PAGE]

Boykin & Davis, LLC

By: 
Peter E. Keup (SC Bar #78383)

Attorney for Respondent Margaret S.
Daniels

BOYKIN & DAVIS, LLC

Attorneys and Counselors at Law

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Peter E. Keup
pkeup@boykinlawsc.com

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SC Court of Appeals

March 8, 2022

VIA ELECTRONIC MAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: Cassandra Selph v. Barbara Boatwright, Margaret S. Daniels, Individually and as Personal Representative of The Estate of Eli Selph, Eli Maurice Selph, and Dwayne Selph Of whom Margaret S. Daniels, Individually and as Personal Representative of the Estate of Eli Selph, and Dwayne Selph are Respondents
Appeals Court Docket No.: 2021-000849

Dear Ms. Kitchings:

Enclosed for filing please find a Notice of Motion and Motion for Substitution of Counsel for Respondent Margaret S. Daniels submitted to the Court via electronic mail in the above-referenced case. Per your email the filing fee for the Motion has been waived.

By copy of this letter, we are serving all parties of record.

Thank you for your assistance in this matter.

Sincerely,



Peter E. Keup

/aeg

Enclosures

cc: Jerome P. Askins, Esq. (w/encls.)
Gary W. Crawford, Esq. (w/encls.)
Bernard Mitchell Alter, Esq. (w/encls.)
Charles J. Boykin, Esq. (w/o encls.)
Kenneth A. Davis, Esq. (w/o encls.)