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Apr 11 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge

Case No. 2018-CP-10-00148
Appellate Case No. 2021-000784

Dewberry 334 Meeting Street, LLC,

Appellant,

v.

City of Charleston and
City of Charleston Board of Architectural Review-Large,

Respondents.

**(1) NOTICE OF APPEARANCE OF ATTORNEYS JOHNSON AND HINES AS
ADDITIONAL COUNSEL FOR RESPONDENTS AND (2) MOTION TO (A)
WITHDRAW ATTORNEY MCQUEENEY AS COUNSEL FOR RESPONDENTS AND
(B) ACCEPT FINAL BRIEF OF RESPONDENTS FOR FILING WITH ATTORNEYS
COPELAND, JOHNSON, AND HINES SHOWN AS RESPONDENTS' COUNSEL**

CLEMENT RIVERS, LLP
Wilbur E. Johnson (SC Bar No. 3062)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
wjohnson@ycrlaw.com
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(843) 720-5488

and

Julia P. Copeland (SC Bar No. 77199)
CITY OF CHARLESTON
Legal Department
50 Broad Street
Charleston, South Carolina 29401
copelandj@charleston-sc.gov
(843)-724-3730

Attorneys for Respondents

(1)
**Notice of Appearance of Attorneys Johnson and Hines
as additional counsel for Respondents**

TO: THIS HONORABLE COURT AND APPELLANT’S COUNSEL

Please enter/note the appearance of attorneys **Wilbur E. Johnson** (SC Bar No. 3062) and **Russell G. Hines** (SC Bar No. 72100), both of the law firm Clement Rivers, LLP (“CR Law”), as additional counsel of record in this matter for Respondents, City of Charleston and City of Charleston Board of Architectural Review-Large. Their contact information is provided in the signature block below.

(2)
Motion to
(a) Withdraw Attorney McQueeney
as counsel for Respondents and
(b) Accept Final Brief of Respondents for Filing
with Attorneys Copeland, Johnson, and Hines
Shown as Respondents’ Counsel

TO: THIS HONORABLE COURT

Besides attorneys Johnson and Hines of CR Law, whose appearance as additional counsel for Respondents is noticed above, Respondents are represented in this matter by in-house counsel, i.e., full-time employee staff counsel from within the City of Charleston’s legal department (“City Legal Staff”).

The City Legal Staff attorneys who are currently counsel of record for Respondents in this Court are **Julia P. Copeland** (SC Bar No. 77199) and **Daniel S. McQueeney, Jr.** (SC Bar No. 6802). Mr. McQueeney, however, is no longer a City Legal Staff attorney.

Wherefore, Respondents’ other counsel of record in this matter—namely, attorneys **Copeland, Johnson, and Hines, who shall all remain counsel of record for Respondents**—

joined by and with the consent of Mr. McQueeney (as evidenced via signature below), hereby move this Honorable Court to (a) allow **Mr. McQueeney** to **withdraw** as counsel of record for Respondents and (b) accept for filing the Final Brief of Respondent, which is conditionally filed/served herewith, with attorneys Copeland, Johnson, and Hines shown as Respondents' counsel.

Respectfully submitted,

By: s/Russell G. Hines
CLEMENT RIVERS, LLP
Wilbur E. Johnson (SC Bar No. 3062)
Russell G. Hines (SC Bar No. 72100)
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copelandj@charleston-sc.gov
(843)-724-3730
Attorneys for Respondents

Charleston, South Carolina

April 11, 2022

<ADDITIONAL SIGNATURE ON THE FOLLOWING PAGE>

I JOIN AND CONSENT:

By: s/Daniel S. McQueeney, Jr.
Daniel S. McQueeney, Jr. (SC Bar No. 6802)
BURR & FORMAN LLP
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**THE STATE OF SOUTH CAROLINA
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Dewberry 334 Meeting Street, LLC,

Appellant,

v.

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City of Charleston Board of Architectural Review-Large,

Respondents.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
Wilbur E. Johnson (SC Bar No. 3062)
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and

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Attorneys for Respondents

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Respondents, hereby certify that the **(1) NOTICE OF APPEARANCE OF ATTORNEYS JOHNSON AND HINES AS ADDITIONAL COUNSEL FOR RESPONDENTS AND (2) MOTION TO (A) WITHDRAW ATTORNEY MCQUEENEY AS COUNSEL FOR RESPONDENTS AND (B) ACCEPT FINAL BRIEF OF RESPONDENTS FOR FILING WITH ATTORNEYS COPELAND, JOHNSON, AND HINES SHOWN AS RESPONDENTS' COUNSEL** was served on April 11, 2022, on all parties to this matter via emailing (see attached) a copy of the same to the following:

Julia P. Copeland, Esquire
copelandj@charleston-sc.gov
City of Charleston
Legal Department
50 Broad Street
Charleston, SC 29401

Additional Counsel for Respondents

G. Trenholm Walker, Esquire
walker@wgflaw.com
Walker Gressette Freeman & Linton, LLC
P.O. Drawer 22167
Charleston, SC 29413
Attorneys for Appellant

Daniel S. McQueeney, Jr., Esquire
cmcqueeneychip@burr.com
Burr & Forman LLP
100 Calhoun Street, Suite 400
Charleston, SC 29401

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines (SC Bar No. 72100)
Attorneys for Respondents

Charleston, South Carolina

April 11, 2022

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Monday, April 11, 2022 3:14 PM
To: 'copelandj@charleston-sc.gov'; 'walker@wgflaw.com'; 'cmcqueeneychip@burr.com'; 'mcqueeneychip@gmail.com'
Cc: Hines, Russell; Johnson, Wilbur; Russell, Karen; Justman, Aimee
Subject: Dewberry 334 v. City of Charleston ; Appellate Case No. 2021-000784
Attachments: Dewberry 334 Meeting v. Charleston -- Not. of Appearance Mot. to Withdraw w POS.pdf

Enclosed please find the following which will be filed today in the above-referenced matter:

- (1) Notice of Appearance of Attorneys Johnson and Hines as Additional Counsel for Respondents; and
- (2) Motion to:
 - (a) Withdraw Attorney McQueeney as Counsel for Respondents; and
 - (b) Accept Final Brief of Respondents for Filing with Attorneys Copeland, Johnson, and Hines Shown as Respondents' Counsel.

Thank you,

Pollyana Bell
Project Assistant
Commercial Litigation Practice Group
Phone:(843)720-5488 | Fax:(843)579-1369



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