

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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May 09 2022

SC Court of Appeals

APPEAL FROM BEAUFORT COUNTY
COURT OF COMMON PLEAS

Appeal No.: 2022-000328

Mark Shaffer, as Personal Representative of the
Estate of Susan Shaffer, Appellant,

v.

DEH Disaster Recovery, LLC, Ceres Environmental
Services, Inc.; Beaufort County, A Political
Subdivision of the State of South Carolina;
Ryan Colter Stoltz; Matt T. Dotson; Tim Tod Dotson;
Brandi Dotson; Spencer A. Olson Trucking, LLC;
Buyers Products, Co.; and TruckPro, LLC, Defendants,

Of which Ceres Environmental Services, Inc. and
Beaufort County, A Political Subdivision of the
State of South Carolina are the Appellants-Respondents,

And Spencer A. Olson Trucking, LLC, DEH Disaster
Recovery, LLC, and Ryan Colter Stoltz are the Respondents.

**MOTION TO ALLOW
WITHDRAWAL OF REPRESENTATION**

Pursuant to Rules 240 and 264(b), SCACR, Respondents DEH Disaster Recovery, LLC, and Ryan Colter Stoltz hereby move this Court to allow O. Carlisle Edwards, Jr., to withdraw from representation of Respondents DEH Disaster Recovery, LLC, and Ryan Colter Stoltz in the above-captioned appeal. Mr. Edwards is retiring from McAngus Goudelock & Courie at the end of this month. I will continue to represent Respondents DEH Disaster Recovery, LLC, and Ryan Colter Stoltz in this appeal.

[SIGNATURE ON FOLLOWING PAGE]

May 9, 2022

Respectfully submitted,

MCANGUS GOUELOCK & COURIE, LLC

s/ Helen F. Hiser

Helen F. Hiser, S.C. Bar No.: 76124

P.O. Box 650007

Mount Pleasant, South Carolina 29465

(843) 576-2900

helen.hiser@mgclaw.com

*Attorneys for Respondents DEH Disaster
Recovery, LLC, and Ryan Colter Stoltz*

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And Spencer A. Olson Trucking, LLC, DEH Disaster
Recovery, LLC, and Ryan Colter Stoltz are the Respondents.

PROOF OF SERVICE

I certify that I have served Respondents DEH Disaster Recovery, LLC, and Ryan
Colter Stoltz **Motion to Allow Withdrawal of Representation** on Appellant, Mark
Shaffer, as Personal Representative of the Estate of Susan Shaffer, and other counsel of
record on May 9, 2022 by emailing a copy of it as follows:

H. Fred Kuhn, Jr., Esquire
James. H. Moss, Esquire
Moss & Kuhn, P.A.
Post Office Drawer 507
Beaufort, South Carolina 29901-0501
fred@mossandkuhn.com
jim@mossandkuhn.com
Attorneys for Plaintiff/Appellant

R. Patrick Flynn, Esquire
Pope Flynn, LLC
Post Office Box 70
Charleston, South Carolina 29402
pflynn@popeflynn.com
**Attorneys for Ceres Environmental Services, Inc. and
Beaufort County A Political Sub-Division of the State of SC**

E. Mitchell Griffith, Esquire
Griffith, Freeman & Liipfert, LLC
Post Office Box 570
Beaufort, South Carolina 29902
mgriffith@griffithfreeman.com

And

Steven D. Pattee, Esquire
Julius Gernes, Esquire
Donna Law Firm, PC
7601 France Avenue South, Suite 350
Minneapolis, Minnesota 55435
spattee@donnalaw.com
jgernes@donnalaw.com
Attorneys for Spencer A. Olson Trucking, LLC

Russell M. Racine
Cranfill Sumner & Hartzog LLP
2907 Providence Road, Suite 200
Charlotte, North Carolina 28211
rracine@cshlaw.com

And

Jonathan M. Menezes
Sutter O'Connell
3600 Erieview Tower, 1301 East 9th Street
Cleveland, Ohio 44114
jmenezes@sutter-law.com
Attorney for Truck Pro, LLC and Buyers Products Company

Charles W. Thomson, Esquire
Glynn Cappell, Esquire
Cappell Thomson, LLC
321 East Bay Street
Charleston, South Carolina 29401
CThomson@CapellThomson.com

and

Marc J. Meister
Marc J. Meister, PLLC
14 Myrtle Bank Road
Hilton Head Island, South Carolina 29926
marc@meisterlegal.com

**Attorneys for Dotson and Son Trucking, Inc., Matt T. Dotson,
Tim Tod Dotson.**

Gray T. Culbreath, Esq.
Alice P. Adams, Esquire
Makenzie E. Polston, Esq.
Gallivan White & Boyd, PA
1201 Main Street, Suite 1200
Columbia, South Carolina 29201
gculbreath@gwblawfirm.com
aadams@gwblawfirm.com
mpolston@gwblawfirm.com

Attorneys for Tetra Tech, Inc.

McANGUS GOUDELOCK & COURIE, LLC

May 9, 2022

s/Helen F. Hiser

Helen F. Hiser
S.C. Bar No.: 76124
735 Johnnie Dodds Blvd., Suite 200 (29464)
P.O. Box 650007
Mount Pleasant, South Carolina 29465
(843) 576-2900
helen.hiser@mgclaw.com

*Attorneys for Respondents DEH Disaster Recovery,
LLC and Ryan Colter Stoltz*



Reply To

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

May 9, 2022

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Via S.C. Courts E-Filing & U.S. Mail

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

RE: Mark Shaffer, as Personal Representative of the Estate of Susan Shaffer, Deceased v. Ryan Colter Stoltz, DEH Disaster Recovery, LLC, Ceres Environmental Services, Inc., Beaufort County A Political Subdivision of the State of South Carolina, Matt T. Dotson, Tim Tod Dotson, Brandi Dotson, Dotson & Son Trucking, LLC, Spencer A. Olson Trucking, LLC, Buyers Products Company, TruckPro, LLC, ST Sales, LLC and Tetra Tech, Inc.
Civil Action No.: 2017-CP-07-01739 (Beaufort)
Date of Incident: May 3, 2017
Carrier Claim No.: 180204-GF
MGC File No.: 20302.17106
Appeal No.: 2022-000328

Dear Ms. Kitchings:

Enclosed please find the original of Respondents DEH Disaster Recovery, LLC and Ryan Colter Stoltz's Motion to Allow Withdrawal of Representation, and the Proof of Service in the above-referenced matter. We are serving counsel of record via email, and ask that they include the undersigned on all future correspondence with the Court concerning this appeal.

We will send our firm's check in the amount of \$50 for filing the motion via U.S. Mail with a copy of this letter.

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

Very truly yours,

Helen F. Hiser

Enclosures

cc: Counsel of Record (via Email)