



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC  
ATTORNEYS AT LAW

Margaret Miles Bluestein  
John Shannon Nichols  
Stacy Elizabeth Thompson  
John Dennis Delgado  
Allison Paige Sullivan  
Ashley Trout Thompson  
Blake Alexander Hewitt  
Kenneth Henry Dojaquez

OF COUNSEL  
Osborne Eugene Powell, Jr.

May 16, 2013

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

RECEIVED

MAY 16 2013

SC Court of Appeals

RE: Jackson v. Wal-Mart Stores East, L.P.  
Case Tracking No.: 2013-000460

Dear Ms. Kitchings:

This letter concerns the motion to be relieved filed by one of my co-counsel, attorney Randolph Frails. While I have no personal objection to his being relieved, I feel obligated to disclose two things with respect to this motion.

The first is that two of my co-counsel are members of the bar of the state of Texas. In May of 2012, Mr. Frails requested that the circuit court in Horry County admit these lawyers *pro hac vice*.

The second is that in March of this year, Judge Steven John denied the Texas lawyers' request that they be relieved from the case. Judge John's order is attached to this letter.

Rule 404 of the South Carolina Appellate Court Rules provides that an attorney may be admitted *pro hac vice* as long as a South Carolina attorney is "associated as attorney of record." Mr. Frails served the Texas lawyers in this capacity, and I am concerned that it would be improper to relieve him while those lawyers continue to be counsel of record. I communicated these concerns to Mr. Frails prior to sending this letter.

No one has asked my firm to sponsor anyone's *pro hac vice* admission for this case, and based on the concerns I have outlined, I would prefer that Mr. Frails remain counsel of record.

Your sincerely,

Blake Hewitt

Blake Hewitt

by EMB with express permission

cc: Randolph Frails, Esquire; Regina H. Lewis, Esquire;  
Rebecca Laffitte, Esquire; and Patricia Jackson (appellant)

**IN THE HORRY COUNTY COURT OF COMMON PLEAS  
STATE OF SOUTH CAROLINA  
FIFTEENTH JUDICIAL CIRCUIT**

**PATRICIA JACKSON, as Administratrix )  
of the Estate of Dorina R. Williams, )  
Plaintiff, )  
v.s. )**

**CIVIL ACTION FILE NO.:  
2011-CP-26-02175**

**WAL-MART STORES EAST, LP, )  
First Defendant, )**

**MOTION FOR LEAVE BY )  
ATTORNEYS )  
NURU WITHERSPOON )  
AND E. LYNETTE STONE )  
TO WITHDRAW )**

**KELLY HARDWICK, )  
Second Defendant, and )**

**JONATHAN ISEL, )  
Third Defendant )**

**HORRY COUNTY  
2013 MAR 15 AM 11:59  
LANIER JOHNSON'S WARD  
CLERK OF COURT**

**ORDER**

**THIS CAUSE COMING ON TO BE HEARD** on Motion for Entry of An Order Allowing Nuru Witherspoon and E. Lynette Stone (Denton), both of whom appeared Pro Hac Vice in the instant case, to Withdraw As Counsel of Record for Plaintiff Patricia Jackson and for the law firm of Kelley Witherspoon LLP and all of its attorneys, including but not limited to Nuru Witherspoon and E. Lynette Stone (Denton) to be relieved of any future professional obligation, responsibility or duty to Patricia Jackson:

**IT IS HEREBY ORDERED THAT** the Motion by Attorneys Nuru Witherspoon and E. Lynette Stone (Denton) as attorneys with the law firm of Kelley Witherspoon, LLP seeking permission to withdraw as counsel for Patricia Jackson is granted and it is further ordered that the law firm of Kelley Witherspoon LLP is relieved of any future professional obligation, responsibility or duty to Patricia Jackson.

**PREPARED BY:  
KELLEY WITHERSPOON LLP  
2614 MAIN STREET  
DALLAS, TEXAS 75226  
PHONE: (972) 850-0500  
FACSIMILE: (972) 850-0400**

*No!  
They can  
stick with  
her to the  
end.  
2/21/13  
5-7-13*

Entered 

\_\_\_\_\_  
Presiding Judge

**RECEIVED**

MAY 16 2013

**SC Court of Appeals**