

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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Aug 23 2022

SC Court of Appeals

Appeal from Sumter County
Court of Common Pleas

Kristi F. Curtis, Circuit Court Judge

Case No. 2017-CP-43-01740
Appellate Case No. 2020-001143

Andrietta Atkinson and Debra Clyburn-Wilson,
individually and as Personal Representatives
of the Estate of Willie Mae Clyburn,

Respondents,

v.

SSC Sumter East Operating Company, LLC
d/b/a Sumter East Health and Rehabilitation Center
and Paul Granger,

Defendants.

Of whom SSC Sumter East Operating Company, LLC
d/b/a Sumter East Health and Rehabilitation Center is

Appellant.

MOTION TO WITHDRAW AS COUNSEL OF RECORD

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Appellant

Appellant is represented in this matter by Clement Rivers, LLP (“CR”). Among the CR attorneys who have appeared in the matter on behalf of Appellant are **Kate C. Mettler** and **Alexandra J. Ginsburg**. Ms. Mettler and Ms. Ginsberg have left CR to practice with another law firm. Accordingly, the other CR attorneys who have appeared on behalf of Appellant in this matter—namely, **Stephen L. Brown; D. Jay Davis, Jr.; and Russell G. Hines, all of whom shall remain counsel of record for Appellant**—joined by and with the consent of Ms. Mettler and Ms. Ginsberg (as evidenced by their signatures below, their signature block reflecting their new firm), hereby move this Honorable Court to allow **Ms. Mettler and Ms. Ginsberg** to **withdraw** as counsel of record for Appellant.

<SIGNED ON THE FOLLOWING PAGE>

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
Russell G. Hines (SC Bar No. 72100)
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(843) 720-5488
Attorneys for Appellant

Charleston, South Carolina

August 23, 2022

WE JOIN AND CONSENT:

By: s/Kate C. Mettler
Kate C. Mettler (SC Bar No. 103762)
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By: s/Alexandra J. Ginsburg
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Charleston, South Carolina

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PROOF OF SERVICE

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
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Attorneys for Appellant

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, hereby certify that the **MOTION TO WITHDRAW AS COUNSEL OF RECORD** was served via email (see attached) on the parties/persons below on August 23, 2022:

D. Nathan Hughey, Esquire

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Bradley H. Banyas, Esquire

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McGowan, Hood & Felder, LLC

Attorneys for Respondents

Kate C. Mettler, Esquire

kmettler@gwblawfirm.com

Alexandra J. Ginsberg, Esquire

aginsburg@gwblawfirm.com

Gallivan, White & Boyd, PA

Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/Russell G. Hines

Russell G. Hines (SC Bar No. 72100)

Attorneys for Appellant

Charleston, South Carolina

August 23, 2022

Hines, Russell

From: Hines, Russell
Sent: Tuesday, August 23, 2022 3:11 PM
To: 'nate@hugheyfirm.com'; 'stuart@hugheyfirm.com'; Brad Banyas; 'Jordan Calloway'; 'Kate Mettler'; Alexandra Ginsburg
Cc: Davis, Jay; 'Brown, Steve'; Justman, Aimee; Bell, Pollyana (Polly)
Subject: Atkinson v. SSC Sumter (2020-001143) -- Motion to Withdraw (Attorneys Mettler and Ginsburg) as Counsel of Record (for Appellant)
Attachments: App. Case No. 2020-001143 - Atkinson v. SSC Sumter -- Mot. to Withdraw as Counsel.pdf

Attached regarding the above-referenced case, please find a **Motion to Withdraw as Counsel of Record**. The motion asks the Court to allow attorneys Kate Mettler and Alex Ginsburg to withdraw as counsel of record for Appellant because Ms. Mettler and Ms. Ginsburg have left Clement Rivers to practice with another firm. Appellant's other counsel of record, Steve Brown, Jay Davis, and myself (Russ Hines), all of us of Clement Rivers, would remain unchanged.

Russell G. Hines
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