

RECEIVED
Nov 09 2022
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

Case No. 2020-000473

White Oak Manor of Spartanburg, Plaintiff,

v.

Paulette Smith-Young,Defendant,

AND

Paulette Smith-Young, Individually and as The Personal Representative of the Estate of Genobia Smith, Deceased, Third-Party Plaintiff,

v.

White Oak Manor-Spartanburg, Inc. d/b/a White Oak of Spartanburg, and White Oak Management, Inc., Third-Party Defendants

OF WHOM

White Oak Management, Inc. isAppellant,
and

Paulette Smith-Young, Individually and as The Personal Representative of the Estate of Genobia Smith, Deceased, isRespondent.

MOTION FOR WITHDRAWAL OF APPEARANCE/SUBSTITUTION

The undersigned move, with consent, for the withdrawal of the appearance of attorneys John E. Rogers, II, and Chad M. Graham, and The Ward Law Firm, P.A., as attorneys of record for the Appellant, White Oak Management, Inc. and substitution of Kelli L. Sullivan, of Turner Padgett Graham & Laney, P.A. as attorney of record for the Appellant.

The present Motion is made with consent of the Appellant, White Oak Management, Inc. and with the consent of attorney Kelli L. Sullivan, who will be the attorney of record for the Appellant.

Therefore, the undersigned move for attorneys John E. Rogers, II, and Chad M. Graham, and The Ward Law Firm, P.A., be withdrawn as attorneys of record for Appellant, White Oak Management, Inc. and Kelli L. Sullivan of Turner Padgett Graham & Laney, P. A. be substituted as attorney of record for Appellant.

Consent and Signature Page to Follow

I consent to the above withdrawal/substation.

s/John E. Rogers, II

John E. Rogers, II

Chad M. Graham

Ward Law Firm, P.A.

PO Box 5663

Spartanburg, SC 29304

(864) 591-2366

(864) 585-3090 – facsimile

jrogers@wardfirm.com

cgraham@wardfirm.com

Withdrawing attorneys for Appellant

Date: November 9, 2022

I consent to the above withdrawal/substation

s/Kelli L. Sullivan (with permission)

Kelli L. Sullivan

Turner Padget Graham & Laney, P.A.

PO Box 1473

Columbia, SC 29202

(803) 227-4321

(803) 799-3957 - facsimile

ksullivan@turnerpadget.com

New attorney for Appellant

Date: November 9, 2022

RECEIVED
Nov 09 2022
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

Case No. 2018-CP-42-04174

White Oak Manor of Spartanburg Plaintiff,

v.

Paulette Smith-Young, Defendant,

AND

Paulette Smith-Young, Individually and as The Personal Representative of the Estate of Genobia Smith, Deceased, Third-Party Plaintiff,

v.

White Oak Manor-Spartanburg, Inc., d/b/a White Oak of Spartanburg, and White Oak Management, Inc., Third-Party Defendants,

OF WHOM

White Oak Management, Inc. is Appellant,
and

Paulette Smith-Young, Individually and as The Personal Representative of the Estate of Genobia Smith, Deceased is Respondent.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the Motion for Withdrawal of Appearance/Substitution was served upon the following on November 9, 2022 via electronic transmission to the following email address(es):

POLIAKOFF & ASSOCIATES, P.A.
Gary W. Poliakoff
Raymond P. Mullman, Jr.
P.O. Box 1571
Spartanburg, SC 29304
atty@gpoliakoff.com
rmullmanjr@gmail.com

Jordan Christopher Calloway, Esquire
McGowan Hood & Felder, LLC
1539 Health Care Dr.
Rock Hill, SC 29732
jcalloway@mcgowanhood.com
Attorneys for Respondent

Ginger D. Goforth (SC Bar #6904)
White Oak Management, Inc.
General Counsel
P.O. Box 3347
Spartanburg, SC 29304
ggoforth@whiteoakmanor.com
Attorney for Appellant White Oak Management, Inc.

Kelli L. Sullivan, Esquire
Turner Padget Graham & Laney, P.A.
PO Box 1473
Columbia, SC 29202
ksullivan@turnerpadget.com
New attorney for Appellant White Oak Management, Inc.

THE WARD LAW FIRM, P.A.

s/ John E. Rogers, II

John E. Rogers, II (SC Bar #72779)

Chad M. Graham (SC Bar # 79859)

P.O. Box 5663

Spartanburg, SC 29304

(864) 591-2366

(864) 585-3090 (fax)

Email: jrogers@wardfirm.com

Email: cgraham@wardfirm.com

November 9, 2022