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Dec 05 2022
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LANCASTER COUNTY
Court of Common Pleas

DeAndrea Gist Benjamin, Circuit Court Judge

Case No. 2018-CP-29-01127
Appellate Case No. 2022-001589

Paul David Hess, APRN-BC, Respondent-Appellant

v.

Morphis Pediatric Group of Lancaster, P.A.; Elizabeth J.
Morphis, M.D.; Gregory M. Alexander, CPA; and
Moore Beauston and Woodham, LLP, Defendants

Of whom Morphis Pediatric Group of Lancaster, P.A. and
Elizabeth J. Morphis, M.D. are Appellants-Respondents

NOTICE OF CROSS APPEAL

Respondent, Paul David Hess, APRN-BC, hereby files this Notice of Cross Appeal of the Order of the Hon. DeAndrea Gist Benjamin dated November 2, 2022. Respondent received a copy of the Order on November 2, 2022, and received a Notice of Appeal from Appellants on November 10, 2022.

December 2, 2022



David E. Rothstein
Rothstein Law Firm, PA
1312 Augusta Street
Greenville, SC 29605
(864) 232-5870
Attorney for Respondent-Appellant

Other Counsel of Record:

Charles F. Thompson, Jr.
Malone Thompson Summers & Ott
339 Heyward Street
Columbia, SC 29201
(803) 254-3300
Attorney for Appellants-Respondents

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Elizabeth J. Morphis, M.D. are Appellants-Respondents

PROOF OF SERVICE

I certify that I have served the Notice of Cross Appeal on Appellants, Morphis Pediatric Group of Lancaster, PA and Elizabeth J. Morphis, M.D., by depositing a copy of it in the United States Mail, postage prepaid, on December 2, 2022, addressed to their attorney of record, Charles F. Thompson, Jr., Malone, Thompson, Summers & Ott, 339 Heyward Street, Columbia, SC 29201.

December 2, 2022



David E. Rothstein
Rothstein Law Firm, PA
1312 Augusta Street
Greenville, SC 29605
(864) 232-5870
Attorney for Respondent-Appellant



ROTHSTEIN LAW FIRM, PA

www.rothsteinlawfirm.com

David E. Rothstein
Certified Specialist in Employment and Labor Law (S.C.)
Also licensed in North Carolina
drotstein@rothsteinlawfirm.com

Jill C. Rothstein
Special Counsel
jrothstein@rothsteinlawfirm.com

December 5, 2022

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SC Court of Appeals

VIA EMAIL (ctappfilings@sccourts.org)
AND U.S. MAIL

Hon. Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Paul David Hess, APRN-BC v. Morphis Pediatric Group of Lancaster, P.A. et al.,
Appellate Case No. 2022-001589

Dear Ms. Kitchings:

I represent Respondent, Paul David Hess, APRN-BC, in the above-referenced case. Enclosed please find the original Notice of Cross-Appeal, which was served by mail on Appellant's counsel on Friday, December 2, 2022, as reflected in the Proof of Service attached to the Notice. I am also enclosing a copy of Judge Benjamin's Order of November 2, 2022, which is the subject of the cross appeal, as well as my firm's check in the amount of \$250.00 for the filing fee.

Please file this Notice and return a clocked-in copy to me via email for my records. If you have any questions or need any additional information, please do not hesitate to call me or email me.

Thank you in advance for your attention to this matter.

Sincerely yours,

David E. Rothstein

Enclosures (3)

cc: Charles F. Thompson, Jr., Esq. (via email only)