

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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Mar 29 2023

SC Court of Appeals

Appeal from Pickens County
Court of Common Pleas

G.D. Morgan, Jr., Circuit Court Judge

Cases No. 2021-CP-39-01127 and -01128
Appellate Case No. 2023-000033

Deonda Weldon, Individually and as
Personal Representative of the Estate of Earline Cooley, Appellant,

v.

Dominion Clemson, LLC d/b/a Dominion Senior Living at
Patrick Square; Dominion Senior Living, LLC; Dominion
Clemson, II, LLC; Dominion Management Group, LLC; and
Dominion Group, LLC, Respondents.

**NOTICE OF APPEARANCE OF ATTORNEY HINES AND
MOTION TO WITHDRAWAL ATTORNEYS BOULIER AND CONNOR**

Russell G. Hines (SC Bar No. 72100)
CLEMENT RIVERS, LLP
25 Calhoun Street, Suite 400
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P.O. Box 993 (29402)
(843) 720-5488

-and-

Joshua T. Thompson (SC Bar No. 79137)
Perry D. Boulier (SC Bar No. 9833)
Ayla G. Luers Connor (SC Bar No. 103057)
BOULIER THOMPSON & BARNES, LLC
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(864) 606-9610

Attorneys for Respondents

TO: THIS HONORABLE COURT AND COUNSEL OF RECORD

Notice of Appearance of Attorney Hines

Please enter/note the appearance of attorney **Russell G. Hines** (SC Bar No. 72100), of Clement Rivers, LLP, as additional counsel of record in this matter for **Respondents**. Mr. Hines's contact information is provided in the signature block below.

Motion to Withdraw Attorneys Boulier and Connor

In addition to Mr. Hines's firm, Clement Rivers, LLP, Respondents are also represented by the firm of Boulier Thompson & Barnes, LLC ("BTB"). Presently, BTB attorneys Joshua T. Thompson (SC Bar No. 79137), Perry D. Boulier (SC Bar No. 9833), and Ayla G. Luers Connor (SC Bar No. 103057) are identified as counsel of record for Respondents in this matter; however, neither Mr. Boulier nor Ms. Connor (who is no longer with BTB) should continue to be identified as counsel of record for Respondents in this matter. In other words, Mr. Thompson is the only BTB attorney who should be identified as counsel of record for Respondents in this matter.

Accordingly, Messrs. Hines and Thompson, with the consent of Mr. Boulier and Ms. Connor, hereby move this Honorable Court to **withdraw Mr. Boulier and**

Ms. Connor as counsel of record for Respondents in this matter, such that **Messrs. Hines and Thompson** are Respondents' only counsel of record in this matter.

Respectfully submitted,

By: s/Russell G. Hines

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March 29, 2023