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Apr 23 2024

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

**APPEAL FROM RICHLAND COUNTY
Court of Common Pleas**

L. Casey Manning, Chief Administrative Judge, Fifth Judicial Circuit

2020-CP-4005802

Raymond G. Farmer, as Director of the
South Carolina Department of Insurance,
and the South Carolina Department of
Insurance,

Respondent,

v.

Jessica Altman, as Rehabilitator of Senior
Health Insurance Company of Pennsylvania,
Patrick H. Cantilo, as Special Deputy
Rehabilitator of Senior Health Insurance
Company of Pennsylvania, and Senior
Health Insurance Company of Pennsylvania
in Rehabilitation,

Appellants

APPELLANTS' MOTION FOR WITHDRAWAL AND SUBSTITUTION OF COUNSEL

Pursuant to Rule 264, SCACR, Charles Kinney of Cozen O'Connor moves to substitute as counsel for Appellants, Michael Humphreys, the Insurance Commissioner of Pennsylvania, in his capacity as Statutory Rehabilitator of Senior Health Insurance Company of Pennsylvania; Patrick H. Cantilo, as Special Deputy Rehabilitator of Senior Health Insurance Company of Pennsylvania; and Senior Health Insurance Company of Pennsylvania in Rehabilitation in the above-captioned

matter as Dakota Knehans is no longer with Cozen O'Connor. Charles Kinney will serve as local counsel for Michael J. Broadbent. Appellants consent to this substitution of counsel.

The undersigned counsel affirm that, prior to filing this motion, Mr. Broadbent communicated by e-mail correspondence with opposing counsel concerning the matter contained herein and has received no objection.

Respectfully submitted this 23rd day of April, 2024.



Charles Kinney, SC Bar No. 77635
COZEN O'CONNOR
301 S. College St., Suite 2100
Charlotte, NC 28202
cakinney@cozen.com
(704) 348-3471

Michael J. Broadbent, *pro hac vice*
1650 Market Street, Suite 2800
Philadelphia, PA 19103
mbroadbent@cozen.com
(215) 665-4732

Counsel for Appellants

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Patrick H. Cantilo, as Special Deputy
Rehabilitator of Senior Health Insurance
Company of Pennsylvania, and Senior
Health Insurance Company of Pennsylvania
in Rehabilitation,

Appellants

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion for Withdrawal and Substitution of Counsel was served upon all parties and/or counsel of record via electronic mail on the 23rd day of April, 2024 (Delivery receipts attached hereto as Exhibit "A") as follows:

Geoffrey R. Bonham, Esquire
Associate General Counsel
South Carolina Department of Insurance
1201 Main Street, Suite 1000
Columbia, SC 29201
Telephone: (803) 737-6219
Email: gbonham@doc.sc.gov



Charles Kinney, SC Bar No. 77635
COZEN O'CONNOR
301 S. College St., Suite 2100
Charlotte, NC 28202
cakinney@cozen.com
(704) 348-3471

EXHIBIT A

From: Scott, Candice
Sent: Tuesday, April 23, 2024 4:29 PM
To: Geoffrey Bonham; gmcGriff@doi.sc.gov
Cc: Broadbent, Michael; Kinney, Charles A.; Cooper, Kimberly
Subject: Farmer v. Altman - Motion for Withdrawal and Substitution of Counsel
Attachments: Motion for Withdrawal and Substitution of Counsel - CK(70109584).pdf

Dear Counsel,

Attached for service, please find Mr. Kinney's motion for withdrawal and substitution of counsel. Thank you.



Candice A. Scott
Paralegal Specialist | Cozen O'Connor
301 South College Street, Suite 2100 | Charlotte, NC 28202
P: 704-348-3457
[Email](#) | [Map](#) | cozen.com



April 23, 2024

VIA FEDERAL EXPRESS

Candice A. Scott
Senior Paralegal
Direct Phone 704-348-3457
cscott@cozen.com

South Carolina Court of Appeals
Attn: Clerk's Office
1220 Senate Street
Columbia, SC 29201

Re: *Farmer, et al. v. Altman, et al*
Richland Court of Common Pleas Case No. 2020-CP-4005802
Court of Appeals Case No. 2022-000219
Motion for Withdrawal and Substitution of Counsel

Dear Court Clerk:

Enclosed please find the check in the amount of \$50.00 for the motion fee. The Motion for Withdrawal and Substitution of Counsel was filed by email addressed to ctappfilings@sccourts.org on April 23, 2023 for the above referenced matter. Should you have any questions, please feel welcome to contact me.

Sincerely,

COZEN O'CONNOR

A handwritten signature in black ink that reads "CScott".

By: Candice A. Scott
Senior Paralegal

CAS
Enclosure

YOUR INV NO.	INV DATE	VENDOR	AMOUNT
479511-04-23-24	04-23-2024	174706	50.00
			\$50.00

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ATTORNEY OPERATING ACCOUNT
 1650 MARKET STREET
 SUITE 2800
 PHILADELPHIA, PA 19103
 215-665-2000

CHECK NO. 803382

55-7265/212

DATE Apr 23, 2024

\$ *****50.00

Fifty and 00/100

PAY TO THE South Carolina Court of Appeals
ORDER OF

South Carolina Court of Appeals
 Clerk's Office
 1220 Senate Street
 Columbia, SC 29201

Citibank, N.A.
 New York, NY

174706

IF OVER \$2,000 TWO SIGNATURES REQUIRED

THIS DOCUMENT CONTAINS HEAT SENSITIVE INK. TOUCH OR PRESS HERE - RED IMAGE DISAPPEARS WITH HEAT.

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