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SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Fairfield County
Court of Common Pleas

Patrick C. Fant, III, Circuit Court Judge

Case No. 2023-CP-20-00268
Appeal Case No. 2024-000596

Thomas D. Kilpatrick
as Special Administrator for the Estate of Anthony Lemon,

Respondent,

v.

Pruitthealth - Ridgeway, LLC f/k/a Unihealth Post-Acute Care -
Tanglewood, LLC, United Health Services of South Carolina,
Inc., Pruitthealth Consulting Services, Inc., Pruitthealth
Therapy Services, Inc. f/k/a United Rehab, Inc., Pruitthealth,
Inc., Neil Pruitt, Jr., THI of South Carolina at Columbia, LLC
d/b/a Midlands Health and Rehabilitation Center, THI of South
Carolina, LLC, Fundamental Clinical and Operational Services,
LLC, Fundamental Clinical Consulting, LLC, Fundamental
Long Term Care Holdings, Inc., Fundamental Administrative
Services, LLC, and Hunt Valley Holdings, LLC,

Defendants,

Of whom THI of South Carolina at Columbia, LLC d/b/a
Midlands Health and Rehabilitation Center, THI of South
Carolina, LLC, Fundamental Clinical and Operational Services,
LLC, Fundamental Administrative Services, LLC, and Hunt
Valley Holdings, LLC, are

Appellants.

MOTION TO WITHDRAW AS COUNSEL OF RECORD

**Counsel identified on the next page*

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Attorneys for Appellants

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

Appellants THI of South Carolina at Columbia, LLC d/b/a Midlands Health and Rehabilitation Center, THI of South Carolina, LLC, Fundamental Clinical and Operational Services, LLC, Fundamental Administrative Services, LLC, and Hunt Valley Holdings, LLC are represented in this matter by Clement Rivers, LLP (“CR”). Among the CR attorneys who have appeared in the matter on behalf of Appellants is **Gaillard T. Dotterer, III**. Mr. Dotterer has left CR to practice with another law firm. Accordingly, the other CR attorneys who have appeared on behalf of Appellants in this matter – namely, **Stephen L. Brown, D. Jay Davis, Jr., Matthew O. Riddle, and Russell G. Hines, all of whom shall remain counsel of record for Appellants** – joined by and with the consent of Mr. Dotterer (as evidenced by his signature below, his signature block reflecting his new firm), hereby move this Honorable Court to allow **Mr. Dotterer** to **withdraw** as counsel of record for Appellants.

[signature on next page]

Respectfully submitted,
CLEMENT RIVERS, LLP

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July 22, 2024

I JOIN AND CONSENT:

By: s/Gaillard Townsend Dotterer, III
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Inc., Neil Pruitt, Jr., THI of South Carolina at Columbia, LLC
d/b/a Midlands Health and Rehabilitation Center, THI of South
Carolina, LLC, Fundamental Clinical and Operational Services,
LLC, Fundamental Clinical Consulting, LLC, Fundamental
Long Term Care Holdings, Inc., Fundamental Administrative
Services, LLC, and Hunt Valley Holdings, LLC,

Defendants,

Of whom THI of South Carolina at Columbia, LLC d/b/a
Midlands Health and Rehabilitation Center, THI of South
Carolina, LLC, Fundamental Clinical and Operational Services,
LLC, Fundamental Administrative Services, LLC, and Hunt
Valley Holdings, LLC, are

Appellants.

PROOF OF SERVICE

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Attorneys for Appellants

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that Appellants' **MOTION TO WITHDRAW AS COUNSEL OF RECORD** was served on Respondent (and the other Defendants besides Appellants) on July 22, 2024, by emailing (see email) a copy of the same to counsel of record:

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Acute Care - Tanglewood, LLC, United
Health Services of South Carolina, Inc.,
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Pruitthealth Therapy Services, Inc. f/k/a
United Rehab, Inc., Pruitthealth, Inc.,
Neil Pruitt, Jr.*

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
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Charleston, South Carolina

July 22, 2024

From: [Bell, Pollyana \(Polly\)](#)
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Subject: Kilpatrick v. Pruitthealth - Ridgeway, LLC ; Appellate Case No. 2024-000596 (CR 230463)
Date: Monday, July 22, 2024 1:38:39 PM
Attachments: [Motion to Withdraw as Counsel of Record.pdf](#)
[1st Motion for Extension - Initial Brief.pdf](#)
[image001.png](#)

Enclosed please find Appellants' Motion to Withdraw as Counsel of Record and Motion for Extension of Time to File/Serve their Initial Brief for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell
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