

RECEIVED

Jan 23 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

R. Ferrell Cothran, Jr., Circuit Court Judge

---

Case No. 2016-CP-40-01875

---

Kimberly Pierce, Individually and as Next Friend  
Of C.H., a minor

Appellant,

v.

Palmetto Health,

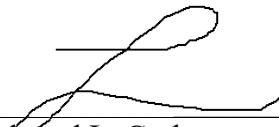
Respondents.

---

NOTICE OF APPEAL

---

Kimberly Pierce, Individually and as Next Friend of C.H., a minor, appeals the following two Orders: (1) Order Denying Motion to Strike Statutory Defense, of the Honorable R. Ferrell Cothran, Jr., dated November 7, 2023, and filed November 8, 2023; and (2) Order of Judge Cothran dated January 15, 2025, and filed January 23, 2025, by which he denied Plaintiff's Motion to Alter /Amend the Order under Rule 59(e), SCRCP.



---

Edward L. Graham  
GRAHAM LAW FIRM, P.A.  
120 Donald Dr.  
Pendleton, S.C. 29670  
[egraham@grahamlawfirm.net](mailto:egraham@grahamlawfirm.net)  
Attorney for Appellant

January 23, 2025

CONTINUED ON NEXT PAGE

Other Counsel of Record:

Lee C. Weatherly  
Nelson D. Post  
Copeland Stair Valz & Lovell, LLP  
40 Calhoun Street, Suite 400  
Charleston, SC 29401

Attorneys for Respondent

RECEIVED

Jan 23 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

R. Ferrell Cothran, Jr., Circuit Court Judge

---

Case No. 2016-CP-40-01875

---

Kimberly Pierce, Individually and as Next Friend  
Of C.H., a minor

Appellant,

v.

Palmetto Health,


Respondents.

---

PROOF OF SERVICE

---

I certify that I have served the Notice of Appeal, on Palmetto Health by electronic mail on January 23, 2025, addressed to its attorneys of record: Lee C. Weatherly and Nelson D. Post of Copeland Stair Valz & Lovell, LLP.

  
\_\_\_\_\_  
Edward L. Graham  
GRAHAM LAW FIRM, P.A.  
120 Donald Dr.  
Pendleton, S.C. 29670  
egrahm@grahamlawfirm.net  
Attorney for Appellant

January 23, 2025

**RECEIVED**

**Jan 23 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

R. Ferrell Cothran, Jr., Circuit Court Judge

---

Case No. 2016-CP-40-01875

---

Kimberly Pierce, Individually and as Next Friend  
Of C.H., a minor

Appellant,

v.

Palmetto Health,

Respondents.

---

PROOF OF SERVICE

---

I certify that I have served a copy of the correspondence to the Court of Appeals, dated January 23, 2025, on Palmetto Health by electronic mail on January 23, 2025, addressed to its attorneys of record: Lee C. Weatherly and Nelson D. Post of Copeland Stair Valz & Lovell, LLP.



---

Edward L. Graham  
GRAHAM LAW FIRM, P.A.  
120 Donald Dr.  
Pendleton, S.C. 29670  
egrahm@grahamlawfirm.net  
Attorney for Appellant

January 23, 2025



Edward L. Graham, Esq.

January 23, 2025

VIA ELECTRONIC SERVICE FILING

Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

**RECEIVED**  
**Jan 23 2025**  
**SC Court of Appeals**

RE: Notice of Appeal  
Case No. 2016-CP-40-01875  
Pierce et al v. Palmetto Health  
Appeal from the Court of Common Pleas, Richland County

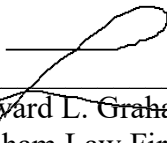
Dear Clerk,

I have enclosed the following for docketing of this appeal:

1. Notice of Appeal
2. Proof of Service of Notice of Appeal
3. Proof of Service of this Correspondence
4. Copies of two Orders subject to the Appeal

Due to the inclement weather, the filing fee will be mailed to your office as soon as possible.

Sincerely,

  
\_\_\_\_\_  
Edward L. Graham, Esq.  
Graham Law Firm  
120 Donald Dr.  
Pendleton, S.C. 29670  
[egraham@grahamlawfirm.net](mailto:egraham@grahamlawfirm.net)  
Attorneys for Appellant

cc: Lee C. Weatherly  
Nelson D. Post

GRAHAM LAW FIRM, P.A.  
Edward L. Graham, Esquire  
120 Donald Drive, Pendleton, SC 29670  
EFax 1.800.859.7028  
EGraham@GrahamLawFirm.net