

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

69803

APPEAL FROM HORRY COUNTY
Court of Common Pleas

RECEIVED

SEP 18 2013

J. Michael Baxley, Circuit Court Judge

SC Court of Appeals

Case No. 2008-CP-26-9047 and 2008-CP-26-9368

Sean D. Fay, as Personal Representative for the
Estate of Kelly L. Fay, Deceased, Respondent/Appellant

v.

Grand Strand Regional Medical Center, LLC, d/b/a
South Strand Ambulatory Care Center, and Stephen
W. Law, D.O., Dr. Richard Young, M.D., and
Grand Strand Urology, LLP, Defendants

Of whom Grand Strand Regional Medical Center, LLC
d/b/a South Strand Ambulatory Care Center is Appellant/Respondent

And of Whom Stephen W. Law, D.O. is Respondent/Appellant

And of Whom Dr. Richard Young, M.D., and
Grand Strand Urology, LLP are, Respondents.

**NOTICE OF MOTION TO REMAND GRAND STRAND REGIONAL
MEDICAL CENTER'S APPEAL TO LOWER COURT FOR
APPROVAL OF PROPOSED SETTLEMENT AND TO HOLD THE
REMAINING APPEALS IN ABEYANCE**

Grand Strand Regional Medical Center, LLC d/b/a South Strand Ambulatory Care
Center ("Grand Strand Regional Medical Center"), by and with the consent of Sean D.
Fay, as Personal Representative for the Estate of Kelly L. Fay, Deceased ("Fay"), hereby
moves to remand its appeal to the trial court for approval and determination that a

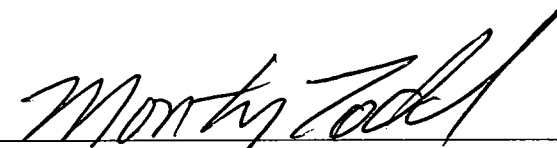
proposed settlement between Grand Strand Regional Medical Center and Fay is just, reasonable, fair, and in the best interests of the statutory beneficiaries of Fay and the Estate of Fay. Fay has not settled his claims against Stephen W. Law, D.O. or Richard Young, M.D., and Grand Strand Urology and the appeals between and among those parties should not be remanded, but should be held in abeyance.

Therefore, by and with the consent of the Fay, Grand Strand Regional Medical Center hereby requests this Court to remand its appeal to the trial court for a hearing to determine that the proposed settlement is just, fair, and reasonable and, if so, to approve the settlement of Fay's claims against Grand Strand Regional Medical Center. Upon approval by the trial court, the parties will advise this Court and ask that Grand Strand's appeal be dismissed. The parties will advise the Court if this proposed settlement is not approved and will request reinstatement of Grand Strand's appeal.

Because Fay has not settled his claims against Dr. Law, Dr. Young, and Grand Strand Urology, the appeals by and against these parties should not be remanded but should be held in abeyance pending a decision by the lower court.

Respectfully submitted,

BY: _____



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Sept 18, 2013

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Of whom Grand Strand Regional Medical Center, LLC
d/b/a South Strand Ambulatory Care Center is Appellant/Respondent

And of Whom Stephen W. Law, D.O. is Respondent/Appellant

And of Whom Dr. Richard Young, M.D., and
Grand Strand Urology, LLP are, Respondents.

PROOF OF SERVICE

I, the undersigned legal assistant, of the law offices of Sowell Gray Stepp & Laffitte, LLC, attorneys for Appellant/Respondent, Grand Strand Regional Medical Center, LLC d/b/a South Strand Ambulatory Care Center, do hereby certify that I have served all counsel in this action with a copy of the Notice of Motion to Remand Grand Strand Regional Medical Center's Appeal to Lower Court for Approval of Proposed Settlement And to Hold the Remaining

Appeals in Abeyance by mailing a copy of same to counsel via United States Mail; postage prepaid, at the following address(es):

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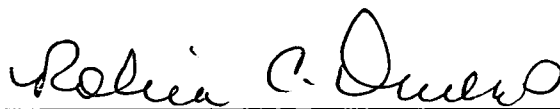
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September 18, 2013