

**RECEIVED**

**Apr 30 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

Roger M. Young, Sr., Circuit Court Judge

---

Appellate Case No. 2024-002067

---

Thorne HealthTech, Inc. and Thorne  
Research, Inc.,

Appellants,

v.

Stephen H. Ross,

Respondent.

---

CONSENT MOTION TO AMEND  
DESIGNATION OF MATTER TO BE INCLUDED  
IN THE RECORD ON APPEAL

---

Kevin A. Hall, SC Bar No. 15063  
1221 Main Street  
Suite 1600  
Columbia, SC 29201  
Telephone (803) 454-6504  
Facsimile (803) 454-6509  
Kevin.Hall@wbd-us.com

Ryan D. Ellard, SC Bar No. 103326  
5 Exchange Street  
P.O. Box 999 (29402)  
Charleston, SC 29401  
Telephone (843) 722-3400  
Facsimile (843) 723-7398  
Ryan.Ellard@wbd-us.com  
-Attorneys for Appellants-

Appellants Thorne HealthTech, Inc. and Thorne Research, Inc., with the consent of Respondent Stephen H. Ross, hereby move to amend Appellants' Designation of Matter to be Included in the Record on Appeal (the "DOM") filed with the Court on January 29, 2025. The grounds for this Motion are that Appellants inadvertently included in their DOM a document that was not presented to the trial court. The document appears as No. 16 "Offer Letter, Aug. 14, 2021" in the DOM. Appellants now file this Motion seeking permission to file an amended DOM deleting No. 16 from the list of documents to be included in the record on appeal.

WHEREFORE, in light of the foregoing, Appellants respectfully request that the Court GRANT this Consent Motion to Amend Appellants' Designation of Matter to be Included in the Record on Appeal and grant Appellants leave to file an amended Designation of Matter to be Included in the Record on Appeal.

April 30, 2025

WE SO MOVE:

*s/Ryan D. Ellard*  
Kevin A. Hall, SC Bar No. 15063  
1221 Main Street  
Suite 1600  
Columbia, SC 29201  
Telephone (803) 454-6504  
Facsimile (803) 454-6509  
Kevin.Hall@wbd-us.com

Ryan D. Ellard, SC Bar No. 103326  
5 Exchange Street  
P.O. Box 999 (29402)  
Charleston, SC 29401  
Telephone (843) 722-3400  
Facsimile (843) 723-7398  
Ryan.Ellard@wbd-us.com  
-Attorneys for Appellants-

April 30, 2025

WE CONSENT:

HAYNSWORTH SINKLER BOYD, P.A.

---

*s/Sarah P. Spruill*

Stafford J. McQuillin, III (SC Bar #78203)

J. Boone Aiken, IV (SC Bar #105243)

P.O. Box 340

Charleston, SC 29402

843.722.3366

[mmcquillin@hsblawfirm.com](mailto:mmcquillin@hsblawfirm.com)

[baiken@hsblawfirm.com](mailto:baiken@hsblawfirm.com)

Sarah P. Spruill (SC Bar #68337)

P.O. Box 2048

Greenville, SC 29602

864.240.3200

[sspruill@hsblawfirm.com](mailto:sspruill@hsblawfirm.com)

Attorneys for Respondent Stephen H. Ross

RECEIVED

Apr 30 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

Roger M. Young, Sr., Circuit Court Judge

---

Appellate Case No. 2024-002067

---

Thorne HealthTech, Inc. and Thorne  
Research, Inc.,

Appellants,

v.

Stephen H. Ross,

Respondent.

---

PROOF OF SERVICE

---

I certify that I have served the *CONSENT MOTION TO AMEND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL* on Respondent Stephen H.

Ross by e-mail to his attorneys of record:

Stafford J. McQuillin, III  
J. Boone Aiken, IV  
Sarah Spruill  
Haynsworth Sinkler Boyd, P.A.  
134 Meeting Street, Third Floor (29401)  
P. O. Box 340  
Charleston, SC 29402-0340  
Telephone: 843.722.3366  
Fax: 843.722.2266  
[mmcquillin@hsblawfirm.com](mailto:mmcquillin@hsblawfirm.com)  
[baiken@hsblawfirm.com](mailto:baiken@hsblawfirm.com)  
[sspruill@hsblawfirm.com](mailto:sspruill@hsblawfirm.com)

-Attorneys for Respondent/Defendant-

April 30, 2025

*s/ Ryan D. Ellard*

Kevin A. Hall, SC Bar No. 15063

1221 Main Street

Suite 1600

Columbia, SC 29201

Telephone (803) 454-6504

Facsimile (803) 454-6509

[Kevin.Hall@wbd-us.com](mailto:Kevin.Hall@wbd-us.com)

Ryan D. Ellard, SC Bar No. 103326

5 Exchange Street

P.O. Box 999 (29402)

Charleston, SC 29401

Telephone (843) 722-3400

Facsimile (843) 723-7398

[Ryan.Ellard@wbd-us.com](mailto:Ryan.Ellard@wbd-us.com)

-Attorneys for Appellants/Plaintiffs-