

JAMES W. BOYD

Attorney at Law

1544 Ebenezer Road
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Rock Hill, SC 29732

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November 12, 2013

VIA U.S. MAIL & ELECTRONIC MAIL – callen@sccourts.org

The Honorable Jenny Abbott Kitchings
ATTN: V. Clara Allen
Clerk of the South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

RECEIVED

NOV 12 2013

SC Court of Appeals

Re: Ann Adams v. Amisub
Appellate Case No.: 2012-212832

Dear Ms. Allen;

Enclosed you will find a Motion, filing fee that will be sent with the original documents and Proof of Service for the above Appeal on the Respondents and their attorneys of record. Thank you for your attention to this matter.

With kind regards, I am

Sincerely,

s/James W. Boyd
Attorney for Appellant

JWB/klc
Attachment

cc: William U. Gunn, Via U.S. Mail & Electronic Mail - bgunn@holcombebomar.com
N. Heyward Clarkson, III, Via U.S. Mail & Electronic Mail -
hclarkson@clarksonwalsh.com

THE STATE OF SOUTH CAROLINA
In the South Carolina Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

John C. Hayes, III, Circuit Court Judge

Appellate Case No. 2012-212832

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SC Court of Appeals

Ann P. Adams, as Personal Representative of the
Estate of Jacob E. Adams, Deceased.Appellant,

v.

Amisub of South Carolina, Inc., d/b/a Piedmont Medical Center and d/b/a
Piedmont Healthcare System;

Staci L. Versen-Rampey, NP, Individually and as Agent, Servant or
Employee of South Carolina Emergency Physicians, LLC, and as Agent,
Servant, or Employee of Amisub of South Carolina, Inc.
d/b/a Piedmont Healthcare System;

Jason Price, Radiologic Technologist, Individually and as Agent, Servant
or Employee of Amisub of South Carolina, Inc., d/b/a Piedmont Medical Center
And d/b/a Piedmont Healthcare System; and

James E. Reinhardt, Jr., M.D., Individually and as Agent, Servant or
Employee of Rock Hill Radiology Associates, P.A. and as Agent,
Servant or Employee of Amisub of South Carolina, Inc.
d/b/a Piedmont Medical Center and d/b/a Piedmont Healthcare System,

Rock Hill Radiology Associates, P.A. South Carolina Emergency Physicians,
LLC,Respondent.

MOTION

The Appellant through her undersigned attorney moves the Court to hold this
matter in abeyance until the case of *Ranucci v. Crain*, 397 S.C. 168, 723 S.E. 2d 242

(S.C. App. 2012) is decided by the South Carolina Supreme Court. The grounds for this motion are that the issues in present case are identical to those in *Ranucci v. Crain*. The South Carolina Supreme Court has granted Certiorari in the case of *Ranucci v. Crain* and the decision in *Ranucci v. Crain* will resolve the issues of the present case. Appellant's Counsel has consulted with the attorney's of the Respondents and all Respondents are agreeable to this request.

THEREFORE, the Appellant moves the Court to hold this matter in abeyance pending the decision of the South Carolina Supreme Court in the case of *Ranucci v. Crain*.

s/James W. Boyd
Post Office Box 36425
1544 Ebenezer Road
Rock Hill, SC 29732
(803) 328-2600

Attorney for Appellant

November 12, 2013

Other Counsel of Record:

William U. Gunn, P.A.
PO Box 1897
Spartanburg, SC 29304
864-594-5300

N. Heyward Clarkson, III
Clarkson, Walsh, Terrell & Coulter, P.A.
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Nov 12, 2013

PAY TO THE
ORDER OF

Clerk of S. C. Court of Appeals

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James W. Boyd

MEMO

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d/b/a Piedmont Healthcare System;

Jason Price, Radiologic Technologist, Individually and as Agent, Servant
Or Employee of Amisub of South Carolina, Inc., d/b/a Piedmont Medical Center
And d/b/a Piedmont Healthcare System; and

James E. Reinhardt, Jr., M.D., Individually and as Agent, Servant or
Employee of Rock Hill Radiology Associates, P.A. and as Agent,
Servant or Employee of Amisub of South Carolina, Inc.
d/b/a Piedmont Medical Center and d/b/a Piedmont Healthcare System,

Rock Hill Radiology Associates, P.A. South Carolina Emergency Physicians,
LLC,Respondent.

PROOF OF SERVICE

I, certify that I served a Motion by James W. Boyd, attorney for Appellant by U.S.
Mail and Electronic Mail on November 12, 2013, addressed to attorneys of record for
Respondents, William U. Gunn, PO Box 1897, Spartanburg, SC 29304;

bgunn@holcombebomar.com.; attorney for Respondent, Amisub of South Carolina, Inc., d/b/a Piedmont Medical Center and d/b/s Piedmont Healthcare System and Jason Price, Radiologic Technologist, Individually and as Agent, Servant, or Employee of Amisub of South Carolina, Inc., d/b/a Piedmont Medical Center and d/b/s Piedmont Healthcare System and N. Heyward Clarkson, III, 1164 A Woodruff Road, Greenville, SC 29607; hclarkson@clarksonwalsh.com.; attorney for Respondent, Staci L. Versen-Pampey, NP, Individually and as Agent, Servant, Employee of South Carolina Emergency Physicians, LLC, and as Agent, Servant, or Employee of Amisub of South Carolina, Inc., d/b/a Piedmont Healthcare System

s/James W. Boyd
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Attorney for Appellant

November 12, 2013