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S.C. SUPREME COURT

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November 12, 2025

**VIA EMAIL and HAND-DELIVERY**

The Honorable Patricia A. Howard  
Clerk, South Carolina Supreme Court  
Supreme Court Building  
1231 Gervais Street  
Columbia, SC 29201  
[supctfilings@sccourts.org](mailto:supctfilings@sccourts.org)

**Re: Jo Ann Blackwell, Michelene Brooks, and Samuel H. Owens, Jr., individually and on behalf of all others similarly situated v. Mary Black Health System, LLC, d/b/a Mary Black Memorial Hospital, CHSPSC, LLC, and Professional Account Services, Inc.; Appellate Case No.: 2025-000346**

Dear Mrs. Howard,

Enclosed for filing in the *Jo Ann Blackwell, et al. v. Mary Black Health System, LLC, et al.*, please find one copy of the Parties' Consent Motion to Hold the Appeal in Abeyance. A check in the amount of \$50.00 which covers the filing fee, is being hand-delivered to your office.

As you are aware, oral argument is scheduled to be held in this matter on Tuesday, November 18, 2025. However, the Parties participated in a lengthy mediation with Mr. Thomas W. Traxler serving as the mediator on November 11, 2025, in an attempt to resolve this matter. At the conclusion of the mediation, the Parties reached an agreement in principle to settle the case—including all class claims. The Parties are actively working to finalize the terms of a complete and detailed class settlement agreement and documents, which will require more time to complete than by next Tuesday.

In the enclosed Consent Motion, the Parties propose that neither they, nor the Court need to expend the additional time, energy, or money preparing for and conducting oral argument. For the sake of judicial economy and to avoid incurring unnecessary expenses in a matter in which the Parties have reached an agreement in principle to settle all claims, the Parties are

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jointly requesting that the Court hold this appeal—including the oral argument scheduled for Tuesday, November 18, 2025—in abeyance while the Parties work together to finalize the terms of a proposed class settlement agreement and related documents.

To facilitate the ongoing administration of this appeal, the Parties are requesting the Court hold this appeal in abeyance for at least sixty (60) days, and the Parties will provide the Court with an update on the status of this matter within thirty (30) days if the Court enters an order holding this appeal in abeyance.

Because this matter is scheduled for oral argument next Tuesday, the Parties respectfully request that the enclosed motion be submitted to the Court for expedited review and consideration so that the Parties and the Court may cease their preparation for oral argument in the event the Court decides to hold this appeal in abeyance.

Should the Court have any questions or need anything further, please do not hesitate to contact us. Furthermore, the Parties are available to discuss any questions or concerns the Court may have in relation to the enclosed Motion and counsel for the Parties can be made available at the Court's convenience to have a conference with the Court to discuss any such issues.

Sincerely,

*s/Katon E. Dawson, Jr.*

Katon E. Dawson, Jr.

KED/tc

Enclosures

cc: All Counsel of Record