

71298

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Case No. 2011-CP-40-3642

Vernon L. McCullough,

Appellant

v.

South Carolina Dept. of  
Corrections, Palmetto Health  
d/b/a Palmetto Health  
Richland, Jonathon David  
Taylor, MD, Poorneema  
Ramasamy, MD, William R.  
Jennings, MD, William H.  
Richardson, MD, and Jennifer  
A. Adair, MD.

Respondents.

**RECEIVED**

FEB 18 2014

**SC Court of Appeals**

MOTION FOR RELIEF OF COUNSEL

Pursuant to Rule 240, SCACR, Richard Bolen, Esquire, (hereafter Movant) of The Bolen Law Firm, 600 Columbia Avenue, Suite 7, Lexington, SC 29072 hereby enters this Motion for Relief of Counsel. Movant is the Appellant's counsel of record for the trial and the appeal of this matter. Movant and Appellant have a retainer agreement under which Movant agreed to represent Appellant at the trial of this matter to the conclusion of the trial on a standard contingency basis. That agreement was

completely executed by both parties. After this matter was dismissed at the trial level Movant agreed to file an appeal on behalf of the Appellant with the understanding that Movant did not have an appellate practice so Appellant would have to hire an appellate lawyer to perfect the appeal. Movant also agreed to assist Appellant in finding an appellate lawyer. Movant contacted Attorney Eric C. Hale who graciously agreed to handle the appeal for Appellant and even made an emergency request for an extension on behalf of Appellant, which was granted before he had a binding retainer agreement or any payment from Appellant.

To date Appellant has not executed a retainer agreement with Movant or appellate counsel Hale nor has he paid for any of the costs for services or fees for the appeal. Movant has been unable to contact Appellant for over a month through the usual means of communication heretofore used to contact Appellant. Movant sent a certified letter explaining the situation with a copy of this motion to Appellant, return receipt requested, to his address of record which is his parent's home address. The letter was received by Appellant on January 14, 2014, as indicated by the signed return receipt attached hereto.

Appellant contacted Movant on January 15, 2014 by telephone and agreed to consent to this Motion for Relief and to return the signed original motion to Movant by January 21, 2014. To date the signed motion has not been received by Movant.

NOW THEREFORE the Movant moves that he be relieved as counsel in this matter.

SO MOVED.

February 10, 2014

A handwritten signature in black ink, appearing to read "Richard Bolen", written over a horizontal line.

Richard Bolen, Attorney for Appellant  
SC Bar No. 9295  
600 Columbia Ave, Suite 7  
Lexington, SC 29072  
803-951-2230

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Motion for Relief of Counsel upon the parties by placing a copy of the same in the United State mail with sufficient postage attached thereto and addressed as follows:

Mark S. Barrow, Esq.  
P.O. Box 12129  
Columbia, SC 29211

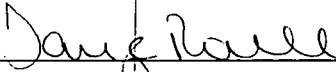
Sheila M. Bias, Esq.  
P.O. Box 7788  
Columbia, SC 29202

Andrew Lindemann, Esq.  
P.O. Box 8586  
Columbia, SC 29202


James E. Parham, Jr., Esq.  
200 Ministry Drive  
P.O. Box 1576  
Irmo, SC 29063

Bill McDow, Esq.  
1900 Barnwell Street  
P.O. Box Drawer 7788  
Columbia, SC 29202

Eric C. Hale, Esq.  
P.O. Box 1605  
Irmo, SC 29201

  
\_\_\_\_\_  
Tanya Rowell - Paralegal

Sworn to before me this 10  
Day of February, 2014.

  
\_\_\_\_\_  
Notary Public – South Carolina  
My Commission Expires: 11/16/17

**RECEIVED**  
FEB 18 2014  
**SC Court of Appeals**

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
Vernon McCullough  
811 Cokesbury Drive  
Columbia SC 29203

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  Agent  
 *Vernon McCullough*  Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1?  Yes  
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 Registered  Return Receipt for Merchandise  
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4. Restricted Delivery? (Extra Fee)  Yes

2. Article Number (Transfer from service label) 7013 0600 0000 8484 0025

# THE BOLEN LAW FIRM, LLC

600 COLUMBIA AVENUE, SUITE 7

LEXINGTON, SC 29072

803-951-2230

803-951-2328 (FAX)

Richard L. Bolen, Esq.

[BLF@BolenLawFirm.com](mailto:BLF@BolenLawFirm.com)

February 10, 2014

V. Claire Allen, Deputy Clerk  
SC Court of Appeals Clerk of Court  
Post Office Box 11629  
Columbia, South Carolina 29211

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SC Court of Appeals

RE: Vernon L. McCullough, Appellant V. South Carolina Department of Corrections, Palmetto Health Richland a/k/a Palmetto Health Alliance, Jonathon David Taylor, M.D., Poorneema Ramasamy, M.D., William R. Jennings, M.D., William H. Richardson, M.D. and Jennifer A. Adair, M.D., Respondent., Case No. 2011-CP-40-3642

Dear Ms. Allen:

Enclosed please find a Motion for Relief of Counsel and a check for \$25.00 for the filing fee. I have also enclosed a certificate of service on all counsel. Please stamp and return the copy in the enclosed envelope.

Thank you for your attention to this matter.

Sincerely,



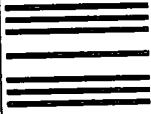
Richard Bolen  
Attorney for Appellant

CC: Mark S. Barrow, Esquire  
James E. Parham, Jr., Esquire  
William C. McDow, Esquire  
Andrew Lindemann, Esquire  
Sheila Bias, Esquire  
Eric Hale, Esquire

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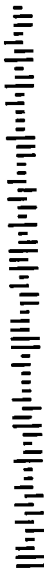
**SC Court of Appeals**



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**BOLEN LAW FIRM, LLC**  
ATTORNEY-AT-LAW  
600 Columbia Ave.  
Lexington, SC 29072



V. Claire Allen, Deputy Clerk  
SC Court Of Appeals Clerk Of Court  
PO-Box-11629  
Columbia SC 29211-1629

