

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM RICHLAND COUNTY

Court of Common Pleas

Appellate Case No.: 2013-001831

Civil Action No.: 2011-CP-40-3642

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FEB 26 2014

SC Court of Appeals

Vernon L. McCullough.....Appellant,

v.

South Carolina Department of Corrections, Palmetto Health
d/b/a Palmetto Health Richland, 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..... Respondents.

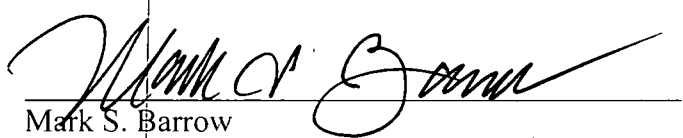
RESPONDENTS WILLIAM R. JENNINGS, M.D. AND
WILLIAM H. RICHARDSON, M.D.'S RETURN TO
MOTION FOR RELIEF OF COUNSEL FILED BY
RICHARD BOLEN

Respondents William R. Jennings and William H. Richardson join the response of Respondents S.C. Department of Corrections, Palmetto Health d/b/a Palmetto Health Richland and Doctors Taylor, Ramasamy, Adair to Attorney Bolen's request to be relieved as counsel. Doctors Jennings and Richardson have no objection to Mr. Bolen's being relieved as counsel, but object to any further delays in the filing of Appellant's initial brief. As recounted in the Response of the Department of Corrections *et al.*, the Appellant has been given more than sufficient time to

perfect his appeal. No more delays should be allowed in the adjudication of this appeal. Further delay of this case, initiated in 2011, hinders the accomplishment of all three of these objectives.

Respectfully submitted,

SWEENEY, WINGATE & BARROW, P.A.



Mark S. Barrow
Benson H. Driggers
Post Office Box 12129
Columbia SC 29211
(803) 256-2233

**ATTORNEYS FOR RESPONDENTS
WILLIAM H. RICHARDSON, M.D.
AND WILLIAM R. JENNINGS, M.D.**

Columbia, South Carolina

February 25, 2014

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William H. Richardson, M.D. and Jennifer A. Adair, M.D..... Respondents.**

CERTIFICATE OF SERVICE

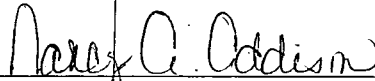
I, the undersigned employee of Sweeny, Wingate & Barrow, P.A., attorneys for Respondents William R. Jennings, M.D. and William H. Richardson, M.D., do hereby certify that I have served a copy of the foregoing Return to Motion for Relief of Counsel filed by Richard Bolen by personally depositing a copy of the same in the United States Postal Service mailbox, postage prepaid, and addressed to the following:

Richard L. Bolen, Esquire
The Bolen Law Firm, LLC
600 Columbia Avenue, Suite 7
Lexington, South Carolina 29072

James E. Parham, Jr., Esquire
James E. Parham, Jr., P.A.
Post Office Box 1576
Irmo, South Carolina 29063

William C. McDow, Esquire
Sheila M. Bias, Esquire
Richardson, Plowden & Robinson, P.A.
Post Office Drawer 7788
Columbia, South Carolina 29202

Eric C. Hale, Esquire
Law Office of Eric C. Hale, LLC
Post Office Box 1605
Irmo, South Carolina 29063



Nancy A. Addison

Columbia, South Carolina

February 25, 2014

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SC Court of Appeals

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SWEENY WINGATE & BARROW P.A.

February 25, 2014

Reply to: Main Office

Mark S. Barrow
(803) 256-2233 x7105
msb@swblaw.com

HAND-DELIVERED

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

RE: McCullough v. William R. Jennings, M.D. and William H. Richardson, M.D., et al.
Civil Action No.: 2011-CP-40-3642
Appellate Case No.: 2013-001831
Our File: 2582-8438

Dear Ms. Kitchings:

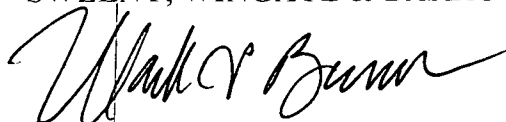
Enclosed please find the original and seven (7) copies of Respondents William R. Jennings, M.D. and William H. Richardson, M.D.'s Response to Motion for Relief of Counsel filed by Richard Bolen in connection with the above-referenced matter for filing. Please file the original and return a filed stamped copy to my courier.

By copy of this letter to opposing counsel, I am serving them with same.

Thank you for your assistance, and should you have any questions, please do not hesitate to contact me.

Yours truly,

SWEENY, WINGATE & BARROW, P.A.



Mark S. Barrow

MSB/naa

Enclosures

February 25, 2014
Page 2 of 2

cc: James E. Parham, Jr., Esquire, w/enclosure
William C. McDow, Esquire, w/enclosure
Sheila M. Bias, Esquire, w/enclosure
Richard Bolen, Esquire, w/enclosure
Eric C. Hale, Esquire, w/enclosure