

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

Case No. 2011-CP-10-8011

RECEIVED

AUG 25 2014

SC Court of Appeals

Assistive Technology Medical
Equipment Services, Respondent,

v.

Hood & Selander, CPAs, Donna C. Cash,
as Personal Representative of the Estate of
Dorothy A. Connelly, W.E. Applegate, III,
as Personal Representative of James B. Connelly,
Kimberly Cuce, and Phillip DeClemente, Defendants,

of whom

Phillip DeClemente is the Appellant.

NOTICE OF APPEARANCE

Attorneys John Nichols and Blake Hewitt respectfully request that the Court note their appearance as additional counsel of record for the respondent. As the Court is aware, all of the respondent's prior counsel remain counsel of record. See Rule 264, SCACR; see also *Ex parte Strom*, 343 S.C. 257, 539 S.E.2d 699 (2000).

/Signature page attached

August 25, 2014

Respectfully submitted,



Blake A. Hewitt, Bar # 73674

John S. Nichols, Bar # 4210

BLUESTEIN NICHOLS

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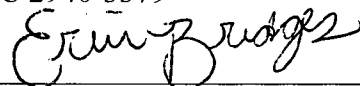
of whom

Phillip DeClemente is the Appellant.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel for the Appellant with a copy of the *Notice of Appearance and Motion to Dismiss* by mailing copies of the same by United States Mail with first class postage prepaid to the following addresses:

Cameron L. Marshall, Esquire
7 Gamecock Ave., Ste. 707
Charleston, SC 2940-3379


Erin Bridges

August 25, 2014



Margaret Miles Bluestein
John Shannon Nichols
Stacy Elizabeth Thompson
John Dennis Delgado
Allison Paige Sullivan
Ashley Trout Thompson
Blake Alexander Hewitt
Kenneth Henry Dojaquez
John Clarke Newton

OF COUNSEL
O. Eugene Powell, Jr.

August 25, 2014

VIA HAND DELIVERY

The Honorable Jenny Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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RE: Assistive Technology Medical Equipment Services v. Hood & Selander, CPAs
Case Tracking No.: 2014-001213

SC COURT OF APPEALS

Dear Ms. Kitchings:

Attorneys John Nichols and Blake Hewitt have been retained to assist as counsel for the Respondent in this case. Please find enclosed the original and one (1) copy of a request to notice their appearance.

Also, please find enclosed for filing the original and seven (7) copies of a motion to dismiss this appeal. I have also enclosed a proof of service on counsel for the Appellant and a check in the amount of \$25.00 for filing this motion. Please return the additional filed copies to me via our courier.

I am copying attorney Davis Howser on this letter because I believe your court's file lists him as a lawyer for the appellant. I believe attorney Howser represents Hood & Selander, who was a defendant below but is not a party to this appeal. If I am wrong in this, please accept my preemptive apology.

Thank you for your attention to this matter. If you need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges

Paralegal to Blake Hewitt

/emb

Enclosures

cc: James E. Smith, Jr., Esquire
Cameron L. Marshall, Esquire
R. Davis Howser, Esquire