

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2013-CP-10-00088

Beverly C. Moore-Rowe,

Appellant,

v.

Bon Secours-St. Francis Xavier Hospital, Inc., d/b/a Bon Secours St. Francis Xavier Hospital, Bon Secours St. Francis Hospital and Roper St. Francis Healthcare, Bon Secours St. Francis Health System, Inc., d/b/a Bon Secours St. Francis Xavier Hospital, Bon Secours St. Francis Hospital and Roper St. Francis Healthcare, Bon Secours Health System, Inc., d/b/a Bon Secours St. Francis Hospital and Roper St. Francis Healthcare, Roper St. Francis Foundation, d/b/a Roper St. Francis Healthcare, Bon Secours-St. Francis Health System Foundation, Inc., d/b/a Roper St. Francis Healthcare, Roper Hospital, Inc., d/b/a Roper St. Francis Healthcare, Byron N. Bailey, M.D., Christine C. Thompson, M.D., a/k/a Christine Thompson, M.D., Charleston Neurosurgical Associates, LLC, Mt. Pleasant Anesthesia Associates, P.A., Charleston Surgery Center Limited Partnership, d/b/a Charleston Surgery Center, Tammy McGraw, CRNA, also known as Tammy McGraw Speicher, CRNA, Nurse Anesthesia of South Carolina, LLC, Jeffery S. Wager, CRNA, Tricoastal Healthcare Billing and Management, Inc., and Steven Heath Cobb,

Respondents.

NOTICE OF APPEARANCE
OF STEPHEN L. BROWN AND RUSSELL G. HINES

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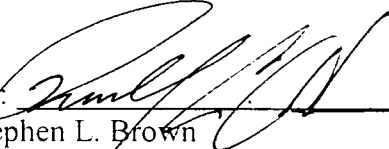
SC Court of Appeals

Stephen L. Brown and Russell G. Hines, of Young Clement Rivers, LLP, respectfully request that this Court note their appearance as additional counsel of record in this matter, along with Joseph J. Tierney, Jr. and Christine K. Toporek (also of Young Clement Rivers, LLP), for the following Respondents (improperly named in the Plaintiff/Appellant's complaint as): **Bon Secours-St. Francis Xavier Hospital, Inc., d/b/a Bon Secours St. Francis Xavier Hospital and Roper St. Francis Healthcare, Bon Secours St. Francis Health System, Inc., d/b/a Bon Secours St. Francis Xavier Hospital and Roper St. Francis Healthcare, Roper St. Francis Healthcare, Roper St. Francis Foundation, d/b/a Roper St. Francis Healthcare, Roper St. Francis Healthcare, Roper Hospital, Inc., d/b/a Roper St. Francis Healthcare.**

<SIGNED ON THE FOLLOWING PAGE>

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By:  _____

Stephen L. Brown
Joseph J. Tierney, Jr.
Christine K. Toporek
Russell G. Hines
25 Calhoun Street, Suite 400
Charleston, SC 29401
P.O. Box 993 (29402)
(843) 577-4000

*Attorneys for Respondents (improperly
named in the Plaintiff/Appellant's
complaint as): Bon Secours-St. Francis
Xavier Hospital, Inc., d/b/a Bon Secours
St. Francis Xavier Hospital and Roper St.
Francis Healthcare, Bon Secours St.
Francis Health System, Inc., d/b/a Bon
Secours St. Francis Xavier Hospital and
Roper St. Francis Healthcare, Roper St.
Francis Healthcare, Roper St. Francis
Foundation, d/b/a Roper St. Francis
Healthcare, Roper St. Francis Healthcare,
Roper Hospital, Inc., d/b/a Roper St.
Francis Healthcare*

Charleston, South Carolina

Dated: 9/19/13

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Charleston County
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R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2013-CP-10-00088

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Respondents.

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SC Court of Appeals

I, Russell G. Hines, of Young Clement Rivers, LLP, do hereby certify that a copy of the **Notice of Appearance of Stephen L. Brown and Russell G. Hines** was sent to all parties or their counsel via United States Mail, postage pre-paid, on September 19, 2013, addressed as follows:

Beverly C. Moore-Rowe
52 Chadwick Drive
Charleston, SC 29407
Pro Se Appellant

Darren K. Sanders, Esquire
Buyck, Sanders & Simmons, LLC
P.O. Box 2424
Mt. Pleasant, SC 29465
*Attorney for Respondents Byron N. Bailey, M.D.
and Charleston Neurosurgical Associates, LLC*

Fred W. Suggs, III, Esquire
Roe Cassidy Coates & Price, PA
P.O. Box 10529
Greenville, SC 29603
*Attorney for Respondents Bon Secours Health System, Inc.,
Bon Secours St. Francis Hospital,
and Bon Secours St. Francis Health System Foundation, Inc.*

Jack G. Gresh, Esquire
Hall Booth Smith, PC
40 Calhoun Street, Suite 550
Charleston, SC 29401
*Attorney for Respondents Charleston Surgery Center Limited Partnership,
d/b/a Charleston Surgery Center*

Andrew S. Halio, Esquire
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P.O. Box 747
Charleston, SC 29402
Attorney for Respondent Steven Heath Cobb

Jonathan H. Dunlap, Esquire
Batten Lee, PLLC
4141 Parklake Avenue, Suite 350
Raleigh, NC 27612

*Attorney for Respondents Nurse Anesthesia of South Carolina, LLC,
Jeffrey S. Wager, CRNA, and Tammy McGraw, CRNA,
also known as Tammy McGraw Speicher, CRNA*

James B. Hood, Esquire
Hood Law Firm, LLC
P.O. Box 1508
Charleston, SC 29402

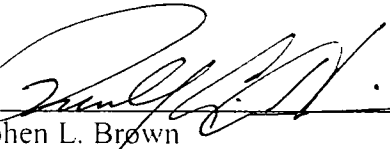
*Attorney for Respondent Christine C. Thompson, M.D.,
a/k/a Christine Thompson, M.D.*

Mt. Pleasant Anesthesia Associates, P.A.
Charles Weinheimer, M.D., Registered Agent
c/o East Cooper Regional Medical Center
1200 Johnnie Dodds Boulevard
Mount Pleasant, SC 29464

<SIGNED ON THE FOLLOWING PAGE>

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

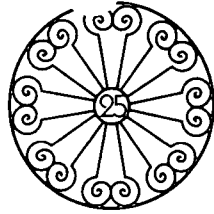
By:  _____

Stephen L. Brown
Joseph J. Tierney, Jr.
Christine K. Toporek
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Attorneys for Respondents (improperly named in the Plaintiff/Appellant's complaint as): Bon Secours-St. Francis Xavier Hospital, Inc., d/b/a Bon Secours St. Francis Xavier Hospital and Roper St. Francis Healthcare, Bon Secours St. Francis Health System, Inc., d/b/a Bon Secours St. Francis Xavier Hospital and Roper St. Francis Healthcare, Roper St. Francis Healthcare, Roper St. Francis Foundation, d/b/a Roper St. Francis Healthcare, Roper St. Francis Healthcare, Roper Hospital, Inc., d/b/a Roper St. Francis Healthcare

Charleston, South Carolina

Dated: 9/19/13



YCR LAW
Young Clement Rivers, LLP

Russell G. Hines
Associate

Direct Dial: (843) 720-5488
Direct Fax: (843) 579-1327
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September 19, 2013

VIA U.S. MAIL

The Honorable Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Beverly Moore-Rowe v. Bon Secours
Circuit Case No.: 2013-CP-10-00088
Appellate Case No.: 2013-001673
YCR File No.: 3810-20130141

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SC Court of Appeals

Dear Ms. Kitchings:

Please note that Stephen L. Brown and I, both of us of Young Clement Rivers, LLP, are now appearing along with Joseph J. Tierney, Jr. and Christine K. Toporek (also of Young Clement Rivers, LLP) in this matter on behalf of the following Respondents (improperly named in the Plaintiff/Appellant's complaint as): **Bon Secours-St. Francis Xavier Hospital, Inc., d/b/a Bon Secours St. Francis Xavier Hospital and Roper St. Francis Healthcare, Bon Secours St. Francis Health System, Inc., d/b/a Bon Secours St. Francis Xavier Hospital and Roper St. Francis Healthcare, Roper St. Francis Healthcare, Roper St. Francis Foundation, d/b/a Roper St. Francis Healthcare, Roper St. Francis Healthcare, Roper Hospital, Inc., d/b/a Roper St. Francis Healthcare.** I would ask that the Court (and the parties/counsel) send all future appellate correspondence in this matter to me and Mr. Brown. I will then ensure that Mr. Tierney and Ms. Toporek are provided with copies of the same.

The original and one (1) copy of our **Notice of Appearance** on behalf of these Respondents is enclosed for filing along with a **Proof of Service** for the same. An additional copy of this letter is also enclosed. Kindly return a stamped copy of the Notice of Appearance, Proof of Service, and this letter in the envelope provided.

ALSO, PLEASE NOTE that the Appellant's Notice of Appeal is incorrect to the extent that it is inconsistent with our firm's representation of the Respondents identified above. In particular, please note that our firm does not represent **Tricoastal Healthcare Billing and Management, Inc.**, nor does our firm represent **Mt. Pleasant Anesthesia Associates, P.A.**


If the Court has any questions or concerns or needs anything further at this time to confirm the Respondents represented by our firm, please let me know.

The Honorable Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
September 19, 2013
Page 2 of 2

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP



Russell G. Hines
Associate

RGH/rg

cc: Beverly C. Moore-Rowe
Darren K. Sanders, Esquire
Fred W. Suggs, III, Esquire
Jack G. Gresh, Esquire
Andrew S. Halio, Esquire
Jonathan H. Dunlap, Esquire
James B. Hood, Esquire
Mt. Pleasant Anesthesia Associates, P.A.
John A. Dunlap, Esquire