

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

Appeal from Greenville County  
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

Case No. 2018-CP-23-05088  
Appellate Case No. 2019-000887

**RECEIVED**  
OCT 30 2019  
SC Court of Appeals

Estate of Mozana Clinkscales, by and through the  
appointed Personal Representative Charlie E. Clinkscales,  
Individually, and on behalf of Statutory Beneficiaries,

Respondents,

v.

Fundamental Clinical and Operational Services, LLC;  
Fundamental Administrative Services, LLC; and  
THI of South Carolina at Magnolia Place at Greenville, LLC  
d/b/a Magnolia Place-Greenville,

Appellants.

**PETITION TO WITHDRAW AS COUNSEL OF RECORD**

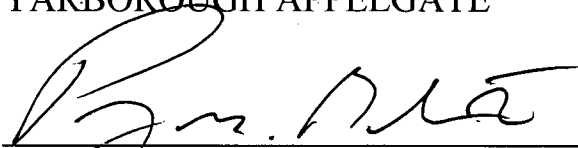
YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Appellants*

Appellants are represented in this matter by Young Clement Rivers, LLP (“YCR”). Among the YCR attorneys who have appeared on behalf of Appellants are Perry M. Buckner, IV, and J. Joseph Owens. Having recently left YCR to practice with other firms, as reflected below, pursuant to Rule 264(b), SCACR, Messrs. Buckner and Owens now petition this Honorable Court to allow their withdrawal as counsel of Record for Appellants.

YARBOROUGH APPELGATE

By:

  
Perry M. Buckner, IV  
291 East Bay Street, Floor 2  
Charleston, SC 29401  
(843) 972-0150

WILLOUGHBY & HOEFER

By:

  
J. Joseph Owens  
133 River Landing Drive, Suite 200  
Charleston, SC 29492  
(843) 619-4426

**Stephen L. Brown, D. Jay Davis, Jr., and Russell G. Hines, all of YCR, will remain as counsel of record for Appellants.** A copy of this petition is being served upon opposing counsel, and the filing fee is submitted herewith.

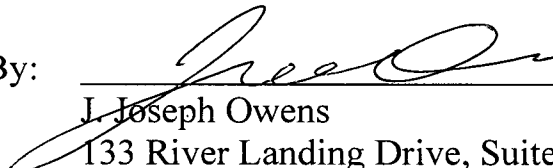
*[Signature on next page]*

Appellants are represented in this matter by Young Clement Rivers, LLP (“YCR”). Among the YCR attorneys who have appeared on behalf of Appellants are Perry M. Buckner, IV, and J. Joseph Owens. Having recently left YCR to practice with other firms, as reflected below, pursuant to Rule 264(b), SCACR, Messrs. Buckner and Owens now petition this Honorable Court to allow their withdrawal as counsel of Record for Appellants.

YARBOROUGH APPELGATE

By: \_\_\_\_\_  
Perry M. Buckner, IV  
291 East Bay Street, Floor 2  
Charleston, SC 29401  
(843) 972-0150

WILLOUGHBY & HOEFER

By: \_\_\_\_\_  
  
J. Joseph Owens  
133 River Landing Drive, Suite 200  
Charleston, SC 29492  
(843) 619-4426

**Stephen L. Brown, D. Jay Davis, Jr., and Russell G. Hines, all of YCR, will remain as counsel of record for Appellants.** A copy of this petition is being served upon opposing counsel, and the filing fee is submitted herewith.

*[Signature on next page]*

Appellants are represented in this matter by Young Clement Rivers, LLP (“YCR”). Among the YCR attorneys who have appeared on behalf of Appellants are Perry M. Buckner, IV, and J. Joseph Owens. Having recently left YCR to practice with other firms, as reflected below, pursuant to Rule 264(b), SCACR, Messrs. Buckner and Owens now petition this Honorable Court to allow their withdrawal as counsel of Record for Appellants.

YARBOROUGH APPELGATE

By: \_\_\_\_\_

Perry M. Buckner, IV  
291 East Bay Street, Floor 2  
Charleston, SC 29401  
(843) 972-0150

WILLOUGHBY & HOEFER

By: \_\_\_\_\_

J. Joseph Owens  
133 River Landing Drive, Suite 200  
Charleston, SC 29492  
(843) 619-4426

**Stephen L. Brown, D. Jay Davis, Jr., and Russell G. Hines, all of YCR, will remain as counsel of record for Appellants.** A copy of this petition is being served upon opposing counsel, and the filing fee is submitted herewith.

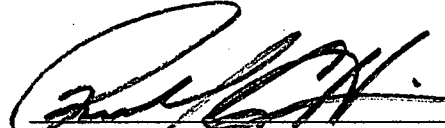
*[Signature on next page]*

*[Signature page for Petition to Withdraw as Counsel of Record;  
Appellate Case No. 2019-000887]*

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By:



Stephen L. Brown (SC Bar No. 66468)

D. Jay Davis, Jr. (SC Bar No. 12084)

Russell G. Hines (SC Bar No. 72100)

25 Calhoun Street, Suite 400

Charleston, South Carolina 29401

P.O. Box 993 (29402)

(843) 720-5488

*Attorneys for Appellants*

Charleston, South Carolina

Dated:

10/28/19

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

---

Appeal from Greenville County  
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

---

Case No. 2018-CP-23-05088  
Appellate Case No. 2019-000887

---

**RECEIVED**  
OCT 30 2019  
SC Court of Appeals

Estate of Mozana Clinkscales, by and through the  
appointed Personal Representative Charlie E. Clinkscales,  
Individually, and on behalf of Statutory Beneficiaries,

Respondents,

v.

Fundamental Clinical and Operational Services, LLC;  
Fundamental Administrative Services, LLC; and  
THI of South Carolina at Magnolia Place at Greenville, LLC  
d/b/a Magnolia Place-Greenville,

Appellants.

---

**PROOF OF SERVICE**

---

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Appellants*

I, Russell G. Hines, of Young Clement Rivers, LLP, attorney for Appellants, hereby certify that the foregoing **PETITION TO WITHDRAW AS COUNSEL OF RECORD** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on October 28, 2019, properly posted for delivery to the following addressees:

Gary W. Poliakoff, Esquire  
Raymond P. Mullman, Jr., Esquire  
Poliakoff & Associates, PA  
215 Magnolia Street  
Spartanburg, SC 29306

*and*

Matthew W. Christian, Esquire  
Christian & Davis, LLC  
1007 E. Washington Street  
Greenville, SC 29601

*Attorneys for Respondents*

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

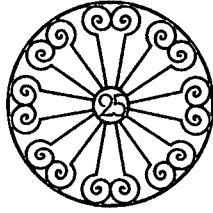
By: 

Russell G. Hines (SC Bar No. 72100)

*Attorneys for Appellants*

Charleston, South Carolina

Dated: 10/28/19



# YCR LAW

Katy B. Barnes  
Legal Secretary

Direct Dial: (843) 720-5488  
Direct Fax: (843) 579-2929  
E-mail: [tbates@ycrlaw.com](mailto:tbates@ycrlaw.com)

October 28, 2019

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

**RECEIVED**

OCT 30 2019

SC Court of Appeals

Re: Estate of Mozana Clinkscales, by and through the appointed Personal Representative Charlie E. Clinkscales, Individually and on behalf of Statutory Beneficiaries vs. Fundamental Clinical and Operational Services, LLC, Fundamental Administrative Services, LLC, and THI of South Carolina at Magnolia Place at Greenville, LLC d/b/a Magnolia Place-Greenville  
Circuit Court Case No.: 2018-CP-23-05088  
YCR File: 14347-20160580

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of a Petition to Withdraw as Counsel of Record, the original and one (1) copy of the Proof of Service of same and our firm's check in the amount of \$50.00 representing the filing fee. Please file the originals and return court-stamped copies to me in the enclosed envelope.

With best wishes and kindest regards, I am

Sincerely,

YCRLAW, LLP

Katy B. Barnes  
Legal Secretary

Enclosures

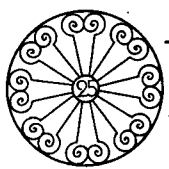
Cc: Gary W. Poliakoff, Esquire, Poliakoff & Associates, PA  
Raymond P. Mullman, Jr., Esquire, Poliakoff & Associates, PA  
Matthew W. Christian, Esquire, Christian & Davis, LLC

10/28/2019  
US POSTAGE \$002.20



ZIP 29401  
011E12650887

**FIRST CLASS MAIL**



**YCR LAW**  
Young Clement Rivers, LLP

25 CALHOUN STREET, SUITE 400  
P.O. BOX 993  
CHARLESTON, SC 29402

SLB  
14347-20160580

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

**RECEIVED**  
OCT 30 2019  
SC Court of Appeals

