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

Appeal from Oconee County
Court of Common Pleas

R. Scott Sprouse, Circuit Court Judge

Case No. 2018-CP-37-00271
Appellate Case No. 2018-002088

RECEIVED
OCT 30 2019
SC Court of Appeals

Betty Herrington,

Respondent,

v.

SSC Seneca Operating Company, LLC,
d/b/a Seneca Health & Rehabilitation Center;
SavaSeniorCare, LLC; SSC Equity Holdings, LLC;
SavaSeniorCare Administrative Services, LLC;
SavaSeniorCare Consulting Services, LLC,

Defendants,

Of whom SSC Seneca Operating Company, LLC,
d/b/a Seneca Health & Rehabilitation Center;
SavaSeniorCare Administrative Services, LLC; and
SavaSeniorCare Consulting Services, LLC,

Appellants.

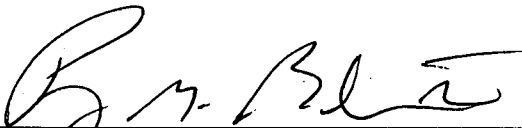
PETITION TO WITHDRAW AS COUNSEL OF RECORD

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 29402
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.

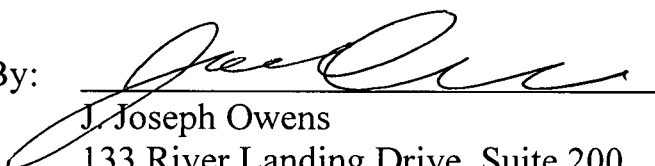
[Signature on next page]

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.

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[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.

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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. 2018-002088]*

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 29402

P.O. Box 993 (29402)

843-720-5488

Attorneys for Appellants

Charleston, South Carolina

Dated: 10/28/19

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Defendants,

Of whom SSC Seneca Operating Company, LLC,
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SavaSeniorCare Administrative Services, LLC; and
SavaSeniorCare Consulting Services, LLC,

Appellants.

PROOF OF SERVICE

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
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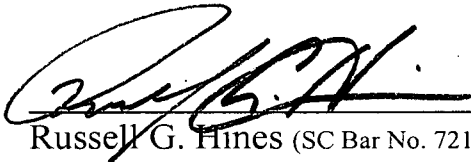
Attorneys for Appellants

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellants, SSC Seneca Operating Company, LLC, d/b/a Seneca Health & Rehabilitation Center; SavaSeniorCare Administrative Services, LLC; and SavaSeniorCare Consulting, LLC (misidentified as “SavaSeniorCare Consulting Services, LLC”), 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 the same in the U.S. Mail on October 28, 2019, properly posted for delivery to the following addressees:

Raymond T. Wooten, Esquire
Smith, Jordan & Lavery, P.A.
1810 East Main Street
Easley, SC 29640

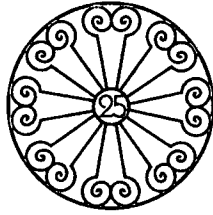
Attorneys for Respondent Betty Herrington

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

Kathleen B. Barnes
Secretary

Direct Dial: (843) 720-5488
Direct Fax: (843) 579-1369
E-mail: kbarnes@ycrlaw.com

October 28, 2019

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

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OCT 30 2019
SC Court of Appeals

Re: Betty Herrington v. SSC Seneca Operating Company, LLC, D/B/A Seneca Health & Rehabilitation Center, SavaSeniorCare, LLC, SSC Equity Holdings, LLC, SavaSeniorCare Administrative Services, LLC, SavaSeniorCare Consulting Services, LLC
Appellate Case No. 2018-002088
Case No.: 2018-CP-37-00271
Claim No.: 17-PL-000169408
YCR File: 14653-20170810

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,

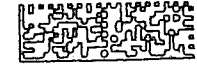
YCR LAW, LLP

Kathleen B. Barnes
Secretary

Enclosures

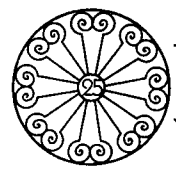
Cc: Raymond T. Wooten, Esquire, Smith, Jordan & Lavery, P.A.

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10/28/2019
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ZIP 29401
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FIRST CLASS MAIL



YCR LAW
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