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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE ADMINISTRATIVE LAW COURT
The Honorable Shirley C. Robinson, Administrative Law Judge

APPELLATE CASE NO.: 2020-001072
ADMINISTRATIVE LAW COURT CASE NOS.: 17-ALJ-07-0441-CC and 17-ALJ-07-0444-CC

Trident Medical Center, LLC, d/b/a Trident Medical Center
and Summerville Medical Center.....Petitioner/Respondents,

v.

South Carolina Department of Health and Environmental Control, and
Medical University Hospital Authority d/b/a MUSC Health Emergency
Services.....Respondents,

Of Which Medical University Hospital Authority d/b/a MUSC Health
Emergency Services is the.....Appellant.

AND

CareAlliance Health Services d/b/a Roper St. Francis Healthcare, Roper Hospital,
Inc., Bon Secours-St. Francis Xavier Hospital, Inc., Roper Mount Pleasant Hospital,
and Roper St. Francis Berkeley Hospital.....Petitioner/Respondent,

v.

South Carolina Department of Health and Environmental Control, and
Medical University Hospital Authority d/b/a MUSC Health Emergency
Services.....Respondents,

Of Which Medical University Hospital Authority d/b/a MUSC Health
Emergency Services is the.....Appellant.

**PETITIONER/RESPONDENT'S MOTION FOR
SUBSTITUTION OF COUNSEL**

Jennifer J. Hollingsworth, SC Bar No. 73535
Shannon V. Lipham, SC Bar No. 103699
NEXSEN PRUET, LLC
1230 Main Street, Suite 700 (29201)
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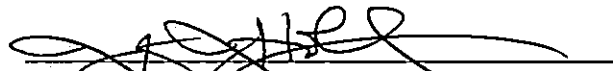
*Attorneys for Petitioner/Respondent, CareAlliance
Health Services, d/b/a Roper St. Francis
Healthcare, Roper Hospital, Inc., Bon Secours-St.
Francis Xavier Hospital, Inc., Roper Mount
Pleasant Hospital, and Roper St. Francis Berkeley
Hospital*

August 11, 2020

Counsel for Petitioner/Respondent, CareAlliance Health Services, d/b/a Roper St. Francis Healthcare, Roper Hospital, Inc., Bon Secours-St. Francis Xavier Hospital, Inc., Roper Mount Pleasant Hospital, and Roper St. Francis Berkeley Hospital, Jennifer J. Hollingsworth of Nexsen Pruet, LLC, hereby requests that this Court grant leave for substitution of counsel to remove Emily D. Glober as counsel of record, as she has relocated out of State and is no longer associated with Nexsen Pruet, LLC, and substitute Shannon V. Lipham as counsel of record for Petitioner/Respondent. Remaining counsel of record have no objection to this request.

Respectfully submitted,

NEXSEN PRUET, LLC



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Bon Secours-St. Francis Xavier Hospital,
Inc., Roper Mount Pleasant Hospital, and
Roper St. Francis Berkeley Hospital*

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Medical University Hospital Authority d/b/a MUSC Health Emergency
Services.....Respondents,

Of Which Medical University Hospital Authority d/b/a MUSC Health
Emergency Services is the.....Appellant.

PROOF OF SERVICE

I hereby certify that I have served a copy of the *Petitioner/Respondent's Motion for Substitution of Counsel* on all parties of record by mailing a copy of the same, addressed as follows, on this 11 day of August, 2020:

Daniel J. Westbrook, Esquire
Travis Dayhuff, Esquire
Nelson Mullins Riley & Scarborough, LP
1320 Main Street, 17th Floor
P.O. Box 11070
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Attorneys for Appellant, Medical University Hospital Authority, d/b/a MUSC Health Emergency Services

David B. Summer, Esquire
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Columbia, SC 29202
Attorneys for Petitioner/Respondents, Trident Medical Center, LLC, d/b/a Trident Medical Centre, and Summerville Medical Center

Ashley C. Biggers, Esquire
Vito M. Wicevic, Esquire
South Carolina Department of Health
& Environmental Control
2600 Bull Street
Columbia, SC 29078
Attorneys for Respondent SC Department of Health & Environmental Control



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Laura L. Smith
Legal Practice Assistant

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SC Court of Appeals

VIA U.S. MAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Post Office Box 11629
Columbia, SC 29211

**Re: Trident Medical Center, LLC d/b/a Trident Medical Center and
Summerville Medical Center v. South Carolina Department of Health
and Environmental Control and Medical University Hospital Authority,
d/b/a MUSC Health Emergency Services
Appellate Case No.: 2020-001072**

Dear Ms. Kitchings:

- Charleston
- Charlotte
- Columbia**
- Greensboro
- Greenville
- Hilton Head
- Myrtle Beach
- Raleigh

Enclosed for filing, please find an original and one (1) copy of *Petitioner/Respondents CareAlliance Health Services, d/b/a Roper St. Francis Healthcare, et al.'s Motion for Substitution of Counsel and a Proof of Service* in the above-referenced matter. I have also enclosed our firm's check in the amount of \$50.00 which represents the filing fee for the same. Please file the originals and return the filed-stamped copies to me in the envelope provided for your convenience.

By copy of this letter, I am hereby serving a copy of the same to all counsel of record.

If you have any questions regarding this matter, please do not hesitate to contact me.

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
August 11, 2020
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With highest regards, I remain

Very truly yours,

A handwritten signature in black ink that reads "Laura L. Smith". The signature is written in a cursive, flowing style.

Laura L. Smith
Legal Assistant to Jennifer J. Hollingsworth

Enclosures

cc: David B. Summer, Jr., Esquire *(via U.S. Mail)*
William R. Thomas, Esquire *(via U.S. Mail)*
Amy Flanary-Smith, Esquire *(via U.S. Mail)*
Ashley C. Biggers, Esquire *(via U.S. Mail)*
Vito M. Wicevic, Esquire *(via U.S. Mail)*
Daniel J. Westbrook, Esquire *(via U.S. Mail)*
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