

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Clifton B. Newman, Circuit Court Judge

Case No. 2018-CP-40-02545
Appellate Case No. 2020-000067

RECEIVED

Aug 24 2020

SC Court of Appeals

Dr. Kaoru Pridgen.....Appellant

v.

Colonial Family Practice, LLC, Varsity Family Care Partners, LLC, Family Care Partners d/b/a
Family Care Partners Management, LLC, Dr. Clay Lowder, Thomas W. Watson, and Dr. Gary R.
Katz..... Respondents.

MOTION TO SEAL

J. Lewis Cromer (#1470)
Shannon M. Polvi (#101837)
1418 Laurel Street, Suite A (29201)
Post Office Box 11675
Columbia, South Carolina 29211
Phone 803-799-9530
Facsimile 803-799-9533
Attorneys for Appellant

Appellant hereby moves the Court for an Order sealing the record on appeal in this case.

The request for the record to be sealed sources from counsel for Respondents Colonial Family Practice, LLC, Family Care Partners d/b/a Family Care Partners Management, LLC, Dr. Clay Lowder, and Thomas W. Watson. Counsel for the parties disagree as to which party is responsible for filing a motion to seal the record on appeal. As a professional courtesy and to forego a waste of resources for the parties and the Court,¹ Appellant is filing this motion to seal.

It is undisputed between the parties that a significant portion of the record on appeal is designated as confidential. A significant portion of the record includes financial information of the parties. There are several exhibits and transcripts that contain information that is reasonably considered confidential and should not be available for public access. Such confidential information is mixed within the record on appeal and is not easily bifurcated. If any bifurcation was needed, the portions of the record on appeal that should be confidential are the exhibits found on pages 457 thru 3799 of the record on appeal.

The undersigned certifies that she conferred with Defendants' counsel. The counsel for Respondents Colonial Family Practice, LLC, Family Care Partners d/b/a Family Care Partners Management, LLC, Dr. Clay Lowder, and Thomas W. Watson seek this motion and counsel for Respondent Varsity Family Care Partners, LLC and counsel for Respondent Dr. Gary R. Katz have not objected to this motion.

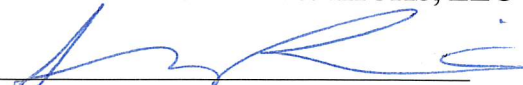
WHEREFORE, Appellant respectfully requests that the Court seal the record on appeal.

¹ For the parties to determine who is reasonable for filing a motion to seal the record on appeal.

Respectfully Submitted,

CROMER BABB PORTER & HICKS, LLC

BY: _____


J. Lewis Cromer (#1470)
Shannon M. Polvi (#101837)
1418 Laurel Street, Suite A (29201)
Post Office Box 11675
Columbia, South Carolina 29211
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Facsimile 803-799-9533
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v.

Colonial Family Practice, LLC; Varsity Family Care Partners, LLC; Family Care Partners d/b/a Family Care Partners Management, LLC; Dr. Clay Lowder; Thomas W. Watson; and Dr. Gary R. Katz, Respondents.

PROOF OF SERVICE

I certify that I, the undersigned employee of Cromer Babb Porter & Hicks, LLC, caused to have served the Motion to Seal on counsel for Respondents by delivering a copy via electronic mail on August 24, 2020, addressed to the following:

Kirby D. Shealy III (#11556)
Lyndey R. Z. Bryant (#100804)
ADAMS AND REESE LLP
1501 Main Street, Fifth Floor
Columbia, South Carolina 29201
Telephone: (803) 254-4190
kirby.shealy@arlaw.com
lyndey.bryant@arlaw.com

Attorneys for Respondents Colonial Family Practice, LLC; Family Care Partners d/b/a Family Care Partners Management, LLC; Dr. Clay Lowder; and Thomas W. Watson

Jeffrey A. Lehrer (#16687)
FORD & HARRISON LLP
100 Dunbar Street, Suite 300
Spartanburg, South Carolina 29306
Telephone: (864) 699-1100
jlehrer@fordharrison.com
Attorney for Varsity Family Care Partners, LLC

Jennifer K. Dunlap (#76031)
PARKER POE ADAMS & BERNSTEIN LLP
200 Meeting Street, Suite 301
Charleston, South Carolina 29401
Phone: (843) 727-2650
jennidunlap@parkerpoe.com
Attorney for Respondent Dr. Gary R. Katz

BY: 

Kate M. Hesik, Litigation Paralegal

C | B | P | H

CROMER BABB PORTER & HICKS, LLC *Attorneys and Counselors at Law*

J. Lewis Cromer * Julius W. Babb, IV * J. Paul Porter * Ryan K. Hicks
Shannon M. Polvi * Samantha E. Albrecht * Elizabeth M. Bowen * Elizabeth S. Millender

August 24, 2020

Via U.S. Mail & E-Mail

Hon. Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201
ctappfilings@sccourts.org

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Aug 24 2020

SC Court of Appeals

**Re: Dr. Kaoru Pridgen v. Colonial Family Practice, et al
Appellate Case No.: 2020-000067**

Dear Ms. Kitchings:

Enclosed for filing please find the original and one copy of Appellant's Motion to Seal along with a Proof of Service. Please return a filed copy to us in the self-addressed, stamped envelope enclosed for your convenience. Also enclosed is this firm's check in the amount of \$50.00 for the fees associated with this filing.

Please do not hesitate to contact me should you have any questions.

With highest regards, I am

Sincerely,



Kate M. Hesik
Litigation Paralegal

/kmh

Enclosures

Cc: Lyndey Bryant, Esquire (via e-mail only)
Jeffrey Lehrer, Esquire (via e-mail only)
Jennifer Dunlap, Esquire (via e-mail only)
Client