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Mar 11 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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

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APPELLATE CASE No.: 2020-001072

ADMINISTRATIVE LAW COURT CASE NO.: 17-ALJ-07-0441-CC  
ADMINISTRATIVE LAW COURT CASE NO.: 17-ALJ-07-0444-CC

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

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.

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**PETITIONER/RESPONDENT CAREALLIANCE HEALTH SERVICES, d/b/a ROPER  
ST. FRANCIS HEALTHCARE, ET AL.'s RETURN TO APPELLANT'S MOTION TO  
SUPPLEMENT**

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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 (“Roper St. Francis”), has no objection to Appellant Medical University Hospital Authority d/b/a MUSC Health Emergency Services’ Motion to Supplement that was filed on March 9, 2021, and believes an abeyance of the deadlines for preparation of the Record and submission of Final Briefs is appropriate pending a resolution of the Motion by this Court.

Respectfully submitted,

*s/ Jennifer J. Hollingsworth*

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Shannon V. Lipham, SC Bar #103699

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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*

March 11, 2021

Columbia, South Carolina

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AND

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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.

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**PROOF OF SERVICE**

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The undersigned hereby certifies that on March 11, 2021, she caused a copy of the foregoing *Petitioner/Respondent's Return to Appellant's Motion to Supplement* to be served upon all parties of record by email addressed as follows:

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Department of Health and Environmental  
Control*

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Center and Summerville Medical Center*

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*Attorneys for Appellant Medical University  
Hospital Authority d/b/a MUSC Health  
Emergency Services*

*s/ Jennifer J. Hollingsworth*  
\_\_\_\_\_  
Jennifer J. Hollingsworth (SC Bar No. 73535)  
Shannon V. Lipham (SC Bar No. 103699)  
**NEXSEN PRUET, LLC**  
1230 Main Street, Suite 700  
Columbia, SC 29201

Laura L. Smith  
Legal Practice Assistant

March 11, 2021

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SC Court of Appeals

**VIA ELECTRONIC 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

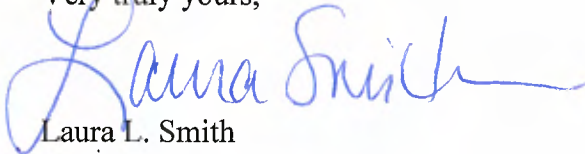
Enclosed for filing, please find *Petitioner/Respondents CareAlliance Health Services, d/b/a Roper St. Francis Healthcare, et al.'s Return to Appellant's Motion to Supplement and a Proof of Service* in the above-referenced matter.

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.

With highest regards, I remain

Very truly yours,



Laura L. Smith  
Legal Assistant to Jennifer J. Hollingsworth

Enclosures

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
March 11, 2021  
Page 2

cc: David B. Summer, Jr., Esquire (*via electronic mail*)  
William R. Thomas, Esquire (*via electronic mail*)  
Amy Flanary-Smith, Esquire (*via electronic mail*)  
Ashley C. Biggers, Esquire (*via electronic mail*)  
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