

RECEIVED

Mar 31 2021

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

SC Court of Appeals

Appeal from York County
Court of Common Pleas

William A. McKinnon, Circuit Court Judge

Case No. 2018-CP-46-01459
Appellate Case No. 2019-000028

Teresa Murphy, as Personal Representative for the Estate of Isaac Strong,

Respondent,

v.

Hunt Valley Holdings, LLC f/k/a Fundamental Long Term Care Holdings, LLC;
Fundamental Clinical and Operational Services, LLC; Fundamental Consulting,
LLC; Fundamental Administrative Services, LLC; THI of Baltimore, Inc.; THI of
South Carolina, LLC; THI of South Carolina at Rock Hill, LLC d/b/a Magnolia
Manor of Rock Hill; and Amisub of S.C., Inc. d/b/a Piedmont Medical Center,

Defendants,

Of whom Fundamental Clinical and Operational Services, LLC; Fundamental
Administrative Services, LLC; THI of South Carolina, LLC; and THI of South
Carolina at Rock Hill, LLC d/b/a Magnolia Manor of Rock Hill are

Appellants.

CONSENT MOTION TO DISMISS APPEAL

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

NOW COME Appellants, Fundamental Clinical and Operational Services, LLC; Fundamental Administrative Services, LLC; THI of South Carolina, LLC; and THI of South Carolina at Rock Hill, LLC d/b/a Magnolia Manor of Rock Hill, by and through Appellants' undersigned counsel, joined by and with the consent of Respondent, Teresa Murphy, as Personal Representative for the Estate of Isaac Strong, by and through Respondent's undersigned counsel, pursuant to Rule 260(b), SCACR, on the grounds that the Parties¹ have agreed to a settlement that moots the instant appeal and mutually desire the relief requested herein, and hereby move this Honorable Court to dismiss this appeal with no costs awarded to or assessed against any Party.

WHEREFORE, Appellants, joined by and with the consent of Respondent, request that the Court enter an order DISMISSING this appeal with NO costs awarded to or assessed against any Party.

<SIGNED ON THE FOLLOWING PAGE>

¹ The "Parties" refers to Appellants and Respondent, collectively. Individually, each of them is a "Party."

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Stephen L. Brown
D. Jay Davis, Jr.
Russell G. Hines
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488
Attorneys for Appellants

Charleston, South Carolina

March 31, 2021

WE JOIN AND CONSENT:

By: s/Jordan C. Calloway
Chad A. McGowan
Eve S. Goodstein
Jordan C. Calloway
MCGOWAN, HOOD & FELDER, LLC
1539 Health Care Drive
Rock Hill, SC 29732
(803) 327-7800

and

John Gressette Felder, Jr.,
Richard A. "Trey" Jones III
MCGOWAN, HOOD & FELDER, LLC
1517 Hampton Street
Columbia, SC 29201
(803) 779-0100

Attorneys for Respondent