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May 05 2021

SC Court of Appeals

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

Appeal from Charleston County
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge
Mikell R. Scarborough, Circuit Court Judge

Case No. 2016-CP-10-02955
Appellate Case No. 2021-000272

TCC of Charleston, Inc.,

Appellant/Respondent,

v.

Concord and Cumberland, LLC, Concord & Cumberland HPR, Leo Hall, Diane Hall, Bea H. Smith, Margaret C. Pope, William D. Foster, Jr., Gene G. Foster, Mattison J. MacGillivray, Teresa MacGillivray, Pamela L. Vaughn, Nelia A. Patricio, Trustee of the Nelia A. Patricio Revocable Trust Agreement, Stuart D. Reeves, Edward T. Strom, Barbara K. Henderson, James R. Clarke, Paul A. Brim, Robert K. Seidl, Jennifer M. Seidl, Robert Kenneth Seidl, II, M. Bert Storey, Thomas R. Mather, Edward T. Strom, 304 Concord & Cumberland, LLC, Marion M. Simpson f/k/a Marion Moore McDonald Simpson, Kathy Gardner, Gregory J. Gardner, Freeman Waterfront Properties, LLC, Jo-Ann Cooper, Betty Y. Segal, Robert M. Levin, and Bonita K. Levin, Donald D. Leonard, Betty L. Beatty, Mattellen, LLC, and Thomas R. Debnam, Trustee of the Trust Agreement of Thomas R. Debnam,

Respondents,

Of which Concord & Cumberland HPR is the

Respondent/Appellant.

NOTICE OF APPEARANCE OF COUNSEL

CLEMENT RIVERS, LLP

Edward D. Buckley, Jr. (SC Bar No. 994)

W. Siau Barr, Jr. (SC Bar No. 76353)

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 Respondent Betty L. Beatty

TO: THE COURT AND ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE THAT **Russell G. Hines**, of Clement Rivers, LLP, hereby enters his appearance as additional counsel of record for **Respondent Betty L. Beatty**, along with Edward D. Buckley, Jr., and W. Siau Barr, Jr.

ADDITIONALLY, as of the date of this notice, C-Track does not show W. Siau Barr, Jr., as counsel of record for Respondent Betty L. Beatty but does show Mr. Barr as counsel of record for a number of other parties. Besides Ms. Beatty, the only other party on whose behalf Mr. Barr has appeared as counsel in this action is Betty Y. Segal, and pursuant to the attached (*see* Exhibit A) Order of Dismissal With Prejudice as to Betty Y. Segal, filed September 18, 2019, Ms. Segal has been dismissed from the action with prejudice. Accordingly, Mr. Barr should only be shown as counsel for Ms. Beatty, and Ms. Segal should not be shown as a Respondent to this appeal, as she has been dismissed from this action with prejudice—and if a motion is required to accomplish this, please let the undersigned know.

<SIGNED ON THE FOLLOWING PAGE>

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Edward D. Buckley, Jr. (SC Bar No. 994)
W. Siau Barr, Jr. (SC Bar No. 76353)
Russell G. Hines (SC Bar No. 72100)
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Attorneys for Respondent Betty L. Beatty

Charleston, South Carolina

May 4, 2021

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

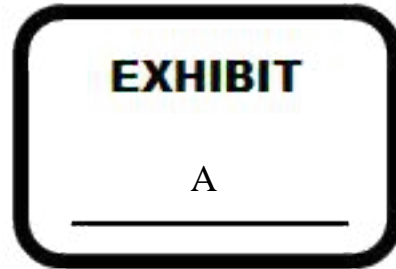
) IN THE COURT OF COMMON PLEAS
) NINTH JUDICIAL CIRCUIT
) CASE NO. 2016-CP-10-02955

TCC OF CHARLESTON, INC.,
Plaintiff,

vs.

CONCORD AND CUMBERLAND, LLC,
CONCORD & CUMBERLAND HPR, LEO
HALL, DIANE HALL, BEA H. SMITH,
MARGARET C. POPE, WILLIAM D.
FOSTER, JR., GENE G. FOSTER,
MATTISON J. MACGILLIVRAY, TERESA
MACGILLIVRAY, PAMELA L. VAUGHN,
NELIA A. PATRICIO, TRUSTEE OF THE
NELIA A. PATRICIO REVOCABLE TRUST
AGREEMENT, STUART D. REEVES,
EDWARD T. STROM, BARBARA K.
HENDERSON, JAMES R. CLARK, PAUL A.
BRIM, ROBERT K. SEIDL, JENNIFER M.
SEIDL, ROBERT KENNETH SEIDL, II, M.
BERT STOREY, THOMAS R. MATHER,
EDWARD T. STROM, 304 CONCORD &
CUMBERLAND, LLC, MARION M.
SIMPSON F/K/A MARION MOORE
MCDONALD SIMPSON, KATHY
GARDNER, GREGORY J. GARDNER,
FREEMAN WATERFRONT PROPERTIES,
LLC, JO-ANN COOPER, BETTY Y. SEGAL,
ROBERT M. LEVIN ADN BONITA K.
LEVIN, DONALD D. LEONARD, BETTY L.
BEATTY, MATTELLEN, LLC, AND
THOMAS R. DEBNAM, TRUSTEE OF THE
TRUST AGREEMENT OF THOMAS R.
DEBNAM,

Defendants.



**ORDER OF DISMISSAL
WITH PREJUDICE AS TO
BETTY Y. SEGAL**

FILED
2019 SEP 18 AM 8:40
JULIE J. ARNHEIM
CLERK OF COURT

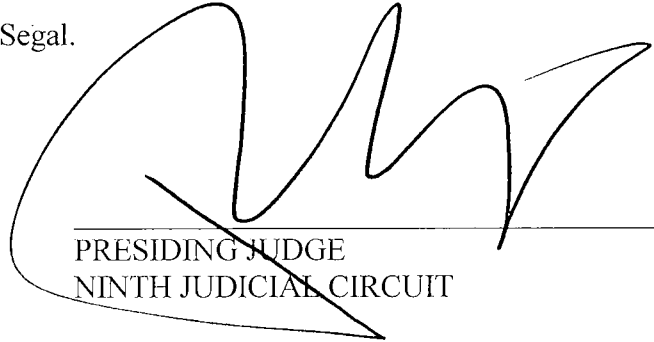
WHEREAS Defendant Betty Y. Segal sold Unit 401 in the Concord and Cumberland Horizontal Property Regime and the Plaintiff and remaining Defendants have agreed to release Betty Y. Segal from this action upon the consummation of the sale and lifting of the stay in the within action.

A handwritten mark, possibly initials or a signature, located at the bottom center of the page.

NOW THEREFORE, on motion of Michael A. Molony and W. Siau Barr, Jr. of Young Clement Rivers, LLP, attorneys for the Defendant, Betty Y. Segal and Betty L. Beatty with the consent of the Andrew K. Epting of Andrew K. Epting, Jr., LLC attorney for the Plaintiff, TCC of Charleston, Inc. and F. Cordes Ford, IV of Womble Bond Dickinson (US), LLP for the remaining Defendants , it is

ORDERED, ADJUDGED AND DECREED that the above-entitled action be dismissed with prejudice as to Defendant Betty Y. Segal.

AND IT IS SO ORDERED.



PRESIDING JUDGE
NINTH JUDICIAL CIRCUIT

Charleston, South Carolina

Dated: June 13, 2019

WE MOVE:

YOUNG CLEMENT RIVERS, LLP

By W. Siau Barr, Jr.
Michael A. Molony
W. Siau Barr, Jr.
Attorney for the Defendant
Betty Y. Segal

WE CONSENT:

ANDREW K. EPTING, JR., LLC

By Andrew K. Epting, Jr.
Andrew K. Epting, Jr.
Jaan G. Rannik
Attorneys for the Plaintiff
TCC of Charleston, Inc.

WE CONSENT:

YOUNG CLEMENT RIVERS, LLP

By Michael A. Molony
Michael A. Molony
W. Siau Barr, Jr.
Attorney for the Defendant
Betty L. Beatty

WE CONSENT:

WOMBLE BOND DICKINSON (US) LLP

By F. Cordes Ford, IV
F. Cordes Ford, IV
Attorney for Remaining Defendants

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SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
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Appeal from Charleston County
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Deadra L. Jefferson, Circuit Court Judge
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Respondents,

Of which Concord & Cumberland HPR is the

Respondent/Appellant.

PROOF OF SERVICE

CLEMENT RIVERS, LLP

Edward D. Buckley, Jr. (SC Bar No. 994)

W. Siau Barr, Jr. (SC Bar No. 76353)

Russell G. Hines (SC Bar No. 72100)

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(843) 720-5488

Attorneys for Respondent Betty L. Beatty

I, Russell G. Hines, of Clement Rivers, LLP, counsel for Respondent Betty L. Beatty, do hereby certify that the foregoing **NOTICE OF APPEARANCE OF COUNSEL** was served on all other parties to this matter on May 4, 2021, via email (see attached) to their counsel of record:

Jaan G. Rannik, Esquire
Epting & Rannik, LLC
46A State Street
Charleston, SC 29401
jgr@epting-law.com

and

Michelle N. Endemann, Esquire
497 St. Andrews Blvd.
Charleston, SC 29407
mendemann@clarksonwalsh.com

Attorneys for Appellant/Respondent

F. Cordes Ford IV, Esquire
Cordes.Ford@wbd-us.com
Henry E. Grimbball, Esquire
Henry.Grimball@wbd-us.com
Robert Andrew Walden, Esquire
Andrew.Walden@wbd-us.com

Womble Bond Dickinson (US) LLP
P.O. Box 999
Charleston, SC 29402

Attorneys for Respondent/Appellant

Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines (SC Bar No. 72100)

Attorneys for Respondent Betty L. Beatty

Charleston, South Carolina

May 4, 2021

From: [Hines, Russell](#)
To: [Jaan Rannik \(jgr@epting-law.com\)](#); ["mendemann@clarksonwalsh.com"](#); ["Cordes.Ford@wbd-us.com"](#); ["Henry.Grimball@wbd-us.com"](#); ["Andrew.Walden@wbd-us.com"](#)
Cc: [Andrew K. Epting](#); ["rhm@epting-law.com"](#); [Buckley, Edward D. \(Ed\)](#); [Barr, Jr., W. Siau](#); [Mixson, Kathryn](#); [DeMato, Amanda](#); [Justman, Aimee](#); [Bell, Pollyana \(Polly\)](#)
Subject: TCC of Chas. v. Concord & Cumberland (2021-000272) -- Notice of Appearance of Counsel (Additional Counsel for Respondent Betty L. Beatty)
Date: Tuesday, May 4, 2021 11:53:48 PM
Attachments: [image001.png](#)
[TCC of Chas. v. Concord & Cumberland \(2021-000272\) -- Notice of Appearance -- RGH.pdf](#)
[Ex. A. -- Order of Dismissal of Betty Y. Segal With Prejudice.pdf](#)

Attached regarding the above-referenced matter, please find a **Notice of Appearance of Counsel**, along with its **Exhibit A**.

Russell G. Hines
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