

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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Jun 17 2021

SC Court of Appeals

Appeal from Charleston County
Court of Common Pleas
Jennifer B. McCoy, Circuit Court Judge

Appellate Care No. 2019-001413
Circuit Court Case No. 2018-CP-10-01251

Richard Ladson, Jr., by and through Richard Miles Ladson, Sr., POA, Respondent,

v.

THI of South Carolina at Charleston, LLC, Appellant.
d/b/a Riverside Health and Rehab,

RESPONDENT'S CONSENT MOTION FOR SUBSTITUTION OF PARTY

PIERCE, SLOAN, WILSON, KENNEDY,
& EARLY, LLC
Carl E. Pierce, II, (SC Bar No. 7946)
Benjamin C. Smoot, II (Sc Bar No. 101372)
P.O. Box 22437
Charleston, South Carolina 29413
843-722-7733

*Attorneys for Respondent Richard Ladson,
Jr., by and through Richard Miles Ladson,
Sr., POA*

NOW COMES the undersigned counsel on behalf of Respondent, Richard Ladson, Jr., by and through Richard Miles Ladson, Sr., POA who pursuant to Rule 265(b) SCAR and with the consent of Appellant hereby moves this Honorable Court for substitution of its party name from Richard Ladson, Jr., by and through Richard Miles Ladson, Sr., POA to the Estate of Richard Ladson Jr. by and through Personal Representative Richard Miles Ladson, Sr.

The ground for this motion is that Respondent Richard Ladson, Jr. passed away due to COVID-19 on July 13, 2020. His son, Richard Miles Ladson, Sr. has now been formally appointed Personal Representative of the Estate of Richard Ladson, Jr. by the Charleston County Probate Court as shown by the Certificate of Appointment of Personal Representative attached hereto as 'Exhibit A.'

[Signature on Following Page]

WE SO MOVE:

Respectfully submitted,

PIERCE|SLOAN LLC

By: *s/ Benjamin C. Smoot, II*
Carl E. Pierce, II (SC Bar No. 7946)
Benjamin C. Smoot, II (Sc Bar No. 101372)
P.O. Box 22437
Charleston, South Carolina 29413
843-722-7733

*Attorneys for Respondent Richard Ladson, Jr., by
and through Richard Miles Ladson, Sr., POA*

Charleston, South Carolina
June 17, 2021

WE CONSENT:

YOUNG CLEMENT RIVERS, LLP

By: *s/ Russell G. Hines*
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina, 29401
(843) 720-5488

*Attorneys for Appellant THI of South Carolina
Charleston, LLC*

Charleston, South Carolina
June 17, 2021

EXHIBIT A

STATE OF SOUTH CAROLINA) IN THE PROBATE COURT
)
COUNTY OF CHARLESTON) **CERTIFICATE OF APPOINTMENT**
)
IN THE MATTER OF:) CASE NUMBER: 2021ES1000953
RICHARD LADSON JR.)
(Decedent))

This is to certify that

RICHARD MILES LADSON SR.

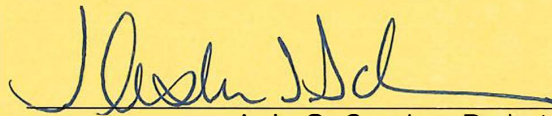
is/are the duly qualified

- PERSONAL REPRESENTATIVE
 SUCCESSOR PERSONAL REPRESENTATIVE
 SPECIAL ADMINISTRATOR

in the above matter and that this appointment, having been executed on the 1 day of June, 2021, is in full force and effect.

RESTRICTIONS: NONE

Executed this 1 day of June, 2021.



Irvin G. Condon, Probate Court Judge
BY ESTATE CLERK

**Do not accept a copy of this certificate without
the raised seal of the Probate Court.**

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v.

THI of South Carolina at Charleston, LLC, d/b/a Riverside Health and Rehab, Appellant.

PROOF OF SERVICE

I, Benjamin C. Smoot, II, of Pierce, Sloan, Kennedy & Early, LLC, counsel for Respondent Richard Ladson, Jr., by and through Richard Miles Ladson, Sr., POA, hereby certify that the foregoing **RESPONDENT'S CONSENT MOTION FOR SUBSTITUTION OF PARTY** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on June 17, 2021, properly posted for delivery to the following addressees:

Young Clement Rivers, LLP
Stephen L. Brown
D. Jay Davis, Jr.
Russell G. Hines
25 Calhoun St., Ste. 400
Charleston, SC 29401
PO Box 993 (29402)
843-720-5488
Attorneys for Appellant

[Signature Page to Follow]

Respectfully submitted,
PIERCE, SLOAN, KENNEDY & EARLY,
LLC

By: *s/ Benjamin C. Smoot, II*
Benjamin C. Smoot, II (SC BAR NO.
101372)
*Attorney for Respondent Richard Ladson,
Jr., by and through Richard Miles Ladson,
Sr., POA*

Charleston, South Carolina
Dated: June 17, 2021