

**RECEIVED**

**Mar 16 2022**

**SC Court of Appeals**

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

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Appeal from Richland County  
Court of Common Pleas

L. Casey Manning, Circuit Court Judge

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Case No. 2019-CP-40-02295

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Vermell Daniels  
as Personal Representative of the Estate of Annie Porter,

Respondent,

v.

THI of South Carolina at Columbia, LLC  
d/b/a Midlands Health & Rehabilitation Center,

Appellant.

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**MOTION TO WITHDRAW AS COUNSEL OF RECORD**

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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)  
Gaillard T. Dotterer, III (SC Bar No. 103620)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Appellant*

Appellant is represented in this matter by Clement Rivers, LLP (“CR”). Among the CR attorneys who have appeared in the matter on behalf of Appellant is **Kate C. Mettler**. Ms. Mettler has left CR to practice with another law firm. Accordingly, the other CR attorneys who have appeared on behalf of Appellant in this matter—namely, **Stephen L. Brown; D. Jay Davis, Jr.; Russell G. Hines; and Gaillard T. Dotterer, III, all of whom shall remain counsel of record for Appellant**—joined by and with the consent of Ms. Mettler (as evidenced by her signature below, her signature block reflecting her new firm), hereby move this Honorable Court to allow **Ms. Mettler** to **withdraw** as counsel of record for Appellant.

**<SIGNED ON THE FOLLOWING PAGE>**

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
Russell G. Hines (SC Bar No. 72100)  
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*Attorneys for Appellant*

Charleston, South Carolina

March 16, 2022

**I JOIN AND CONSENT:**

By: s/Kate C. Mettler  
Kate C. Mettler (SC Bar No. 103762)  
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Charleston, South Carolina

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**PROOF OF SERVICE**

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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)  
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*Attorneys for Appellant*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, hereby certify that the **MOTION TO WITHDRAW AS COUNSEL OF RECORD** was served via email (see attached) on the parties/persons below on March 16, 2022:

D. Nathan Hughey, Esquire  
[nate@hugheylawfirm.com](mailto:nate@hugheylawfirm.com)  
A. Stuart Hudson, Esquire  
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*Attorneys for Respondents*

Kate C. Mettler, Esquire  
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40 Calhoun Street, Suite 300  
Charleston, SC 29401

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Russell G. Hines (SC Bar No. 72100)  
*Attorneys for Appellant*

Charleston, South Carolina

March 16, 2022

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Wednesday, March 16, 2022 11:14 AM  
**To:** 'nate@hugheyfirm.com'; 'stuart@hugheyfirm.com'; 'Brad Banyas';  
'Jennifer@hugheyfirm.com'  
**Cc:** Hines, Russell; Justman, Aimee; 'kmettler@gwblawfirm.com'  
**Subject:** Daniels v. THI; Appellate Case No. 2020-000501  
**Attachments:** Daniels v. THI (App. Case No. 2020-000501) -- Mot. to Withdraw as Counsel.pdf

Enclosed please find a Motion to Withdraw as Counsel of Record in the above-referenced matter which will be filed today.

Thank you,

Pollyana Bell  
Project Assistant  
Commercial Litigation Practice Group  
Phone:(843)720-5488 | Fax:(843)579-1369



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