

**RECEIVED**

**Mar 16 2022**

**SC Court of Appeals**

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

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Appeal from Greenville County  
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

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Case No. 2019-CP-23-00473  
Appellate Case No. 2019-001955

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Estate of Patricia Royston, by and through  
the appointed Personal Representative, Marianne McCoig,  
Individually, and on behalf of the statutory beneficiaries, Respondent,

v.

Hunt Valley Holdings, LLC  
a/k/a Fundamental Long Term Care Holdings, LLC;  
Fundamental Clinical and Operational Services, LLC;  
Fundamental Administrative Services, LLC; and  
THI of South Carolina at Magnolia Place at Greenville, LLC,  
d/b/a Magnolia Place-Greenville, Appellants.

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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)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Appellants*

Appellants are represented in this matter by Clement Rivers, LLP (“CR”). Among the CR attorneys who have appeared in the matter on behalf of Appellants 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 Appellants in this matter—namely, **Stephen L. Brown; D. Jay Davis, Jr.; and Russell G. Hines, all of whom shall remain counsel of record for Appellants**—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 Appellants.

<**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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(843) 720-5488  
*Attorneys for Appellants*

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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Individually, and on behalf of the statutory beneficiaries,

Respondent,

v.

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Fundamental Administrative Services, LLC; and  
THI of South Carolina at Magnolia Place at Greenville, LLC,  
d/b/a Magnolia Place-Greenville,

Appellants.

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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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P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Appellants*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, 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:

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*Attorneys for Respondents*

Respectfully submitted,  
CLEMENT RIVERS, LLP

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

*Attorneys for Appellants*

Charleston, South Carolina

March 16, 2022

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Wednesday, March 16, 2022 11:47 AM  
**To:** 'atty@gpoliakoff.com'; 'rmullmanjr@gmail.com'; 'mchristian@cclawfirm.com'; 'Jordan Calloway'; 'kmettler@gwblawfirm.com'  
**Cc:** Hines, Russell; Justman, Aimee  
**Subject:** Royston v. Hunt Valley Holdings; Appellate Case No. 2019-001955  
**Attachments:** Royston v. HVH (2019-001955) -- 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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