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Mar 16 2022

SC Court of Appeals

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

Appeal from Spartanburg County
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

Case No. 2019-CP-42-03075

Betty Nanney,
by and through her Attorney-in-Fact, Leslie Nanney,

Respondent,

v.

THI of South Carolina at Spartanburg, LLC,
d/b/a Magnolia Manor-Spartanburg, Rusty Flathmann,
Laura Anne Winn, and Olishia Gaffney,

Appellants.

MOTION TO WITHDRAW AS COUNSEL OF RECORD

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 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.; Russell G. Hines; and Gaillard T. Dotterer, III**, 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)
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 Appellants

Charleston, South Carolina

March 16, 2022

I JOIN AND CONSENT:

By: s/Kate C. Mettler
Kate C. Mettler (SC Bar No. 103762)
GALLIVAN, WHITE & BOYD, PA
40 Calhoun Street, Suite 300
Charleston, South Carolina 29401
(843) 414-8077

Charleston, South Carolina

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Laura Anne Winn, and Olishia Gaffney,

Appellants.

PROOF OF SERVICE

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 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:

Gary W. Poliakoff, Esquire
atty@gpoliakoff.com
Raymond P. Mullman, Jr., Esquire
rmullmanjr@gmail.com
Edward John Waelde, Esquire
jwaelde@gpoliakoff.com
Poliakoff & Associates, P.A.
P.O. Box 1571
Spartanburg, SC 29304

Kate C. Mettler, Esquire
kmettler@gwblawfirm.com
Gallivan, White & Boyd, PA
40 Calhoun Street, Suite 300
Charleston, SC 29401

and

Jordan C. Calloway, Esquire
jordan@mcgowanhood.com
McGowan, Hood & Felder, LLC
1539 Health Care Drive
Rock Hill, SC 29732
Attorneys for Respondent

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)

From: Bell, Pollyana (Polly)
Sent: Wednesday, March 16, 2022 11:25 AM
To: 'atty@gpoliakoff.com'; 'rmullmanjr@gmail.com'; 'jwaelde@gpoliakoff.com'; 'Jordan Calloway'; 'kmettler@gwblawfirm.com'
Cc: Hines, Russell; Justman, Aimee
Subject: Nanney v. THI; Appellate Case No. 2020-000500
Attachments: Nanney v. THI (App. Case No. 2020-000500) -- Mot. to Withdraw 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



CLEMENT RIVERS, LLP
25 Calhoun Street • Suite 200 • Charleston, SC 29401
www.clementrivers.com