

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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**RECEIVED**

**Aug 29 2022**

**SC Court of Appeals**

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

J. Mark Hayes, II, Circuit Court Judge

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Case No. 2022-CP-42-00454

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Ed Medford, in his individual capacity, and on behalf of those similarly situated, ..... Respondents,

v.

Deepak Israni, R Cucamonga, LLC, PAC R Cucamonga LP, Pacifica Skylyn, LLC, d/b/a Pacifica Senior Living Skylyn, Etros, LLC, and Matthew Arledge, ..... Appellants.

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NOTICE OF APPEAL

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Defendants, Deepak Israni, R Cucamonga, LLC, PAC R Cucamonga LP, Pacifica Skylyn, LLC, d/b/a/ Pacifica Senior Living Skylyn, Etros, LLC, and Matthew Arledge (hereafter “Appellants”), hereby appeal the Order filed July 28, 2022, denying Appellants’ Motion to Stay Litigation and Compel Arbitration. Appellants received written notice of the entry of this order on or about July 28, 2022.

August 29, 2022

s/Jonathan G. Roquemore  
Jonathan G. Roquemore (SC Bar No. 68274)  
Joshua D. Shaw (SC Bar No. 77835)  
Paul E. Allen, Jr. (SC Bar No.: 104062)  
Hedrick Gardner Kincheloe & Garofalo LLP  
1230 Main Street, Suite 325  
Columbia, SC 29201

**Other Counsel of Record:**

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*Attorneys for Plaintiffs/Respondents*

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Pacifica Senior Living Skylyn, Etros, LLC, and Matthew Arledge, ..... Appellants.

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CERTIFICATE OF SERVICE

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It is hereby certified that the foregoing Notice of Appeal in the above-captioned case has  
been served on the following parties via e-mail, on August 29, 2022, pursuant to the South  
Carolina Supreme Court Order No. 2020-000447, as amended on May 5, 2022:

Patrick E. Knie  
Knie & Shealy Attorneys at Law  
250 Magnolia Street  
Spartanburg, SC 29306  
[pknie@knielaw.com](mailto:pknie@knielaw.com)

Mitch Slade  
Mitch Slade Law Office, P.A.  
PO Box 1007  
Spartanburg, SC 29304  
[mitch@mitchsladelaw.com](mailto:mitch@mitchsladelaw.com)  
*Attorneys for Plaintiffs/Respondents*

*s/Paul E. Allen Jr.*  
Paul E. Allen, Jr.

August 29, 2022

**From:** [Paul E. Allen, Jr](#)  
**To:** [pknie@knielaw.com](mailto:pknie@knielaw.com); [mitch@mitchsladelaw.com](mailto:mitch@mitchsladelaw.com)  
**Cc:** [Jonathan G. Roquemore](#); [Joshua D. Shaw](#); [Laurin M. Stevens](#)  
**Subject:** Notice of Appeal - Ed Medford et al. v. Deepak Israni et al. (Case No. 2022-CP-42-00454)  
**Date:** Monday, August 29, 2022 3:03:00 PM  
**Attachments:** [Notice of Appeal.PDF](#)

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Good afternoon,

Please see the attached Notice of Appeal in the above-referenced case. Pursuant to South Carolina Supreme Court Order No. 2020-000447, as amended on May 5, 2022, we are serving the attached Notice of Appeal on the primary e-mail address available on AIS. We intend to file the attached Notice of Appeal at the Court of Appeals this week.

Best regards,

Paul Allen



**HEDRICK GARDNER**  
HEDRICK GARDNER KINCHELOE & GAROFALO LLP  
ATTORNEYS AT LAW

**RECEIVED**

**Aug 29 2022**

Charlotte • Raleigh • Wilmington • Columbia • Asheville

**SC Court of Appeals**

August 29, 2022

**Via e-mail**

South Carolina Court of Appeals  
Honorable Jenny Kitchings  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)  
1220 Senate Street  
Columbia, SC 29201

**Reply To:**

Paul E. Allen, Jr.  
1230 Main Street, Suite 325  
Columbia, SC 29201  
Direct: 803-274-3102  
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Email: [pallen@hedrickgardner.com](mailto:pallen@hedrickgardner.com)

**RE: Ed Medford, in his individual capacity, and on behalf of those similarly situated v. Pacifica Skylyn LLC, d/b/a Pacifica Senior Living Skylyn, et al.**  
**Civil Action No: 2022-CP-42-00454**

Dear Ms. Kitchings:

Enclosed for filing is the Notice of Appeal in the above captioned case, along with the following:

- (1) Proof of service of the Notice of Appeal on the Respondents, including a copy of the e-mail serving the Notice of Appeal; and
- (2) A copy of the order to be challenged on appeal.

The \$250.00 filing fee will be submitted under separate cover within five (5) days of the filing of the Notice of Appeal.

Very truly yours,

*s/ Paul E. Allen, Jr.*

Paul E. Allen, Jr.

PEA/pea

Cc: All Counsel of Record (via e-mail)

Enclosure(s)