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Dec 28 2022

SC Court of Appeals

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

Appeal from Dorchester County
Court of Common Pleas

Robert Bonds, Circuit Court Judge
R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2021-CP-18-01030

Tammy China,
as Personal Representative of the
Estate of Emma Lee James,

Respondent,

v.

Palmetto Hallmark Operating, LLC
d/b/a Hallmark Healthcare Center, and
Elite Patient Care of South Carolina, PC,

Defendants,

Of which Palmetto Hallmark Operating, LLC
d/b/a Hallmark Healthcare Center is

Appellant.

NOTICE OF APPEAL

CLEMENT RIVERS, LLP
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D. Jay Davis, Jr. (SC Bar No. 12084)
Matthew O. Riddle (SC Bar No. 76650)
Kara S. Grevey (SC Bar No. 101742)
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Attorneys for Appellant

Other Counsel of Record:

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-and-

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Attorneys for Defendant

Elite Patient Care of South Carolina, PC

Defendant/Appellant Palmetto Hallmark Operating, LLC d/b/a Hallmark Healthcare Center (“Appellant”) hereby appeals the following orders the Honorable R. Markley Dennis, Jr., Circuit Court Judge, and the Honorable Robert Bonds, Circuit Court Judge, respectively:

- Order of the Honorable R. Markley Dennis, Jr., Circuit Court Judge, filed May 4, 2022;
- Order of the Honorable Robert Bonds, Circuit Court Judge, filed November 28, 2022; and
- Order of the Honorable Robert Bonds, Circuit Court Judge, filed December 28, 2022.

Copies of the appealed orders are attached hereto and incorporated herein by reference. Appellant received written notice of entry of the most recent order on December 28, 2022.

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)
Matthew O. Riddle (SC Bar No. 76650)
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Attorneys for Appellant

Charleston, South Carolina

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Defendants,

Of which Palmetto Hallmark Operating, LLC
d/b/a Hallmark Healthcare Center is

Appellant.

PROOF OF SERVICE

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Attorneys for Appellant

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, hereby certify that Appellant's **NOTICE OF APPEAL** was served on Respondent and Defendant Elite Patient Care of South Carolina, PC, on December 28, 2022, by emailing (see attached email) a copy of the same to their counsel of record:

Mario A. Pacella, Esquire
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ROGERS TOWNSEND, LLC
*Attorneys for Defendant
Elite Patient Care of South Carolina, PC*

I also certify that a copy of this **NOTICE OF APPEAL** was this day, December 28, 2022, E-Filed with the lower court (see attached NEF), which also, i.e., in addition to service by email, effected service of the notice today on all counsel of record via the E-Filing System.

Respectfully submitted,
CLEMENT RIVERS, LLP

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

Charleston, South Carolina

December 28, 2022

Hines, Russell

From: Hines, Russell
Sent: Wednesday, December 28, 2022 1:28 PM
To: Mario Pacella; Jessica Fickling; Amy Willbanks; 'Joseph Tierney, Jr'; Hunter A. Morgan; 'billy.sweeny@rogerstownsendsend.com'
Cc: 'Brown, Steve'; Davis, Jay; Riddle, Matthew; Grevey, Kara S.; Wakeham, Rebecca (Becky); Peterson, Susan; Justman, Aimee; Bell, Pollyana (Polly)
Subject: China v. Palmetto Hallmark (Case No. 2021-CP-18-01030) -- Notice of Appeal
Attachments: China v. Palmetto Hallmark (Case No. 2021-CP-18-01030) -- Notice of Appeal.pdf; Order of the Honorable R. Markley Dennis, Jr., Circuit Court Judge, filed May 4, 2022.pdf; Order of the Honorable Robert Bonds, Circuit Court Judge, filed November 28, 2022.pdf; Order of the Honorable Robert Bonds, Circuit Court Judge, filed December 28, 2022.pdf

Attached regarding the above-referenced case please find Palmetto Hallmark Operating, LLC d/b/a Hallmark Healthcare Center's **Notice of Appeal** and copies of the **Appealed Orders**, which are incorporated therein by reference.

Russell G. Hines
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***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2021CP1801030

Official File Stamp: 12-28-2022 01:36:38 PM
Court: CIRCUIT COURT
Common Pleas
Dorchester
Case Caption: Tammy China , plaintiff, et al VS Palmetto Hallmark Operating Llc , defendant, et al
Document(s) Submitted: Appeal/Notice of Appeal to Court of Appeals
- Exhibit/Filing of Exhibits
- Exhibit/Filing of Exhibits
- Exhibit/Filing of Exhibits
Filed by or on behalf of: Russell Grainger Hines

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Russell Grainger Hines for Hallmark Healthcare Center, Palmetto Hallmark Operating Llc
Amy E. Willbanks for Tammy China et al
Donald Jay Davis, Jr. for Hallmark Healthcare Center, Palmetto Hallmark Operating Llc
Matthew Oliver Riddle for Hallmark Healthcare Center, Palmetto Hallmark Operating Llc
Kara Shea Grevey for Hallmark Healthcare Center, Palmetto Hallmark Operating Llc
Joseph John Tierney, Jr. for Elite Patient Care Of South Carolina Pc
Jessica Lerer Fickling for Tammy China
Hunter Adam Morgan for Elite Patient Care Of South Carolina Pc
Mario Anthony Pacella for Tammy China

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means: