

**RECEIVED**  
**Feb 02 2023**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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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

Appellate Case No. 2022-001210

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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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DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL

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Appellants propose the following be included in the Record on Appeal:

1. Order of Judge Mark Hayes, II dated July 28, 2022;
2. Complaint;
3. Appellant’s Motion to Dismiss and/or Compel Arbitration;
4. Appellant’s Memorandum of Law in Support of Motion to Dismiss and/or Compel Arbitration;
5. Respondent’s Memorandum of Law in Opposition to Motion to Dismiss and/or Compel Arbitration; and,
6. Transcript of Hearing on Motion to Dismiss and/or Compel Arbitration.

I certify that this designation contains no matter which is irrelevant to this appeal.

*s/Paul E. Allen*

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Paul E. Allen, Jr. (SC Bar No.: 104062)

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CERTIFICATE OF SERVICE

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It is hereby certified that the foregoing Designation of Matter to be Included in the Record on Appeal in the above-captioned case has been served on the following parties via e-mail, on February 2, 2023, pursuant to the South Carolina Supreme Court Order No. 2020-000447, as amended on May 5, 2022:

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

February 2, 2023



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

**RECEIVED**

**Feb 02 2023**

**SC Court of Appeals**

Charlotte • Raleigh • Wilmington • Columbia • Asheville

February 2, 2023

**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:**

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**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**  
**Appellate Case No.: 2022-001210**

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter is Appellants' Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Certificates of Service. Please do not hesitate to contact me if you have any questions or concerns.

Very truly yours,

*s/ Paul E. Allen, Jr.*

Paul E. Allen, Jr.

PEA/pea

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

Enclosure(s)