

**RECEIVED**

**Apr 17 2023**

**SC Court of Appeals**

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

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Appeal from Colleton County  
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

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Case No. 2021-CP-15-00657  
Appellate Case No. 2022-001242

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Jennifer Rahn,  
as Personal Representative for the Estate of Robert Ramsey,

Respondent,

v.

Priority Home Care, LLC and  
St. George Health Care, LLC, d/b/a St. George Healthcare Center,

Defendants,

Of which St. George Health Care, LLC, d/b/a  
St. George Healthcare Center is the

Appellant.

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**APPELLANT'S DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

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CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
James D. Gandy, III (SC Bar No. 11925)  
Russell G. Hines (SC Bar No. 72100)  
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*Attorneys for Appellant*

Appellant proposes the following to be included in the Record on Appeal:

### **Orders**

1. Order Denying Motion to Compel Arbitration, filed June 29, 2022;
2. Order Denying Defendant's Motion to Reconsider, filed August 3, 2022;

### **Pleadings**

3. Summons and Complaint, filed November 4, 2021;
  - a. Affidavit of Merit of Luanne Trahan MSN, APRN, FNP-BC;
4. The Facility's<sup>1</sup> Answer to Complaint, filed December 15, 2021;

### **Transcripts**

5. Transcript of May 19, 2022 Motion Hearing in *Washington v. St. George Health Care, LLC*;
6. Transcript of May 19, 2022 Motion Hearing;

### **Other Material**

7. St. George Health Care, LLC d/b/a St. George Healthcare Center's Motion to Compel Arbitration, filed March 7, 2022;
  - a. Exhibit A, Arbitration Agreement;
  - b. Exhibit B, Health Care Power of Attorney;
8. Defendant's Memorandum in Support of Motion to Dismiss Plaintiff's Complaint, Compel Arbitration and Stay State Court Proceedings, filed May 18, 2022;
  - a. Exhibit 1, Admission Agreement;

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<sup>1</sup> The "Facility" refers to Defendant St. George Health Care, LLC, d/b/a St. George Healthcare Center.

- b. Exhibit 2, Arbitration Agreement;
  - c. Exhibit 3, Assignment Agreement, Authorizations, Consents, and Acknowledgments, Consent for the Release of Medical Records;
9. Plaintiff's Memorandum in Opposition to Motion to Compel Arbitration, filed May 19, 2022;
  10. The Facility's Motion to Alter, Amend, and/or Reconsider Order Denying Motion to Compel Arbitration, filed July 11, 2022;
  11. Plaintiff's Memorandum in Opposition to Motion to Reconsider, filed July 19, 2022;
  12. Notice of Appeal (omitting orders, including Proof of Service in Circuit Court).

I certify that this Designation of Matters contains no matter irrelevant to this appeal.

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
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