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**Jul 11 2023**

**SC Court of Appeals**

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

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Appeal from Sumter County  
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

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Case No. 2022-CP-43-00355

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Stanley Dale Floyd and Stephanie Floyd,

Respondents,

v.

SSC Sumter East Operating Company, LLC  
d/b/a Sumter East Health and Rehab Center,  
SSC Equity Holdings, LLC, SavaSeniorCare, LLC,  
SavaSeniorCare Administrative and Consulting, LLC,  
SavaSeniorCare Consulting, LLC, SMV Sumter East, LLC, and  
Natasha Nadkarni,

Appellants.

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**NOTICE OF APPEAL**

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David L. Williford (SC Bar No. 73129)  
HUFF, POWELL & BAILEY, LLC  
15 S. Main Street, Suite 602  
Greenville, South Carolina 29601  
(864) 400-5949

*Attorney for Appellants*

Other Counsel of Record:

Matthew W. Christian (SC Bar No. 70516)  
CHRISTIAN & CHRISTIAN, LLC  
P.O. Box 332  
Greenville, South Carolina 29602  
(864) 232-7363

*Attorney for Respondents*

Defendants/Appellants, SSC Sumter East Operating Company, LLC d/b/a Sumter East Health and Rehab Center, SSC Equity Holdings, LLC, SavaSeniorCare, LLC, SavaSeniorCare Administrative and Consulting, LLC SavaSeniorCare Consulting, LLC, SMV Sumter East, LLC, and Natasha Nadkarni (“Appellants”), hereby appeal the following orders of the Honorable Benjamin H. Culbertson, Circuit Court Judge:

- **Form 4 Order filed September 8, 2022**, denying Appellants’ respective motions to compel arbitration and to stay;
- **Formal Order filed October 4, 2022**, denying Appellants’ respective motions to compel arbitration and to stay; and
- **Form 4 Order filed June 5, 2023**, denying Appellants’ motion to alter, amend, and/or reconsider order denying motion to compel arbitration and motions to say; and

Copies of the appealed orders are attached hereto and incorporated herein by reference. Appellants received written notice of entry of the most recent order on June 5, 2023.

Respectfully submitted,

By: s/David L. Williford  
David L. Williford (SC Bar No. 73129)  
HUFF, POWELL & BAILEY, LLC  
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*Attorney for Appellants*

Greenville, South Carolina

July 5, 2023

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SavaSeniorCare Consulting, LLC, SMV Sumter East, LLC, and  
Natasha Nadkarni,

Appellants.

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**PROOF OF SERVICE**

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David L. Williford (SC Bar No. 73129)  
HUFF, POWELL & BAILEY, LLC  
15 S. Main Street, Suite 602  
Greenville, South Carolina 29601  
(864) 400-5949

*Attorney for Appellants*

I, David L. Williford, of Huff, Powell & Bailey, LLC, attorney for Appellants, hereby certify that Appellants' **NOTICE OF APPEAL** was served on Respondents on July 5, 2023, by emailing (see attached email) a copy of the same to their counsel of record:

Matthew W. Christian, Esquire  
CHRISTIAN & CHRISTIAN, LLC  
[mchristian@cclawfirm.com](mailto:mchristian@cclawfirm.com)

*Attorney for Respondents*

Respectfully submitted,

By: s/David L. Williford  
David L. Williford (SC Bar No. 73129)  
HUFF, POWELL & BAILEY, LLC  
*Attorney for Appellants*

Greenville, South Carolina

July 5, 2023

**From:** [David Williford](mailto:David.Williford@huffpowellbailey.com)  
**To:** [mchristian@cclawfirm.com](mailto:mchristian@cclawfirm.com)  
**Cc:** [BDMosley@SavaSC.com](mailto:BDMosley@SavaSC.com); [RMLonas@SavaSC.com](mailto:RMLonas@SavaSC.com); [Riddle, Matthew](#); [Gandy, III, James D. \(Tripp\)](#); [Davis, Jay](#); [Wakeham, Rebecca \(Becky\)](#); [Justman, Aimee](#); [Bell, Pollyana \(Polly\)](#); [Hines, Russell](#); [Jennifer C. Little](#); [Craig Brookes](#)  
**Subject:** Notice of Appeal (see attached) - Floyd v. Sumter East Health & Rehab, et al. (C.A. # 2022-CP-43-00355)  
**Date:** Wednesday, July 5, 2023 3:24:43 PM  
**Attachments:** [Floyd v. SSC Sumter East \(22-CP-43-00355\) -- Notice of Appeal.pdf](#)  
[Appealed Order 1 -- filed 9-8-22.pdf](#)  
[Appealed Order 2 -- filed 10-4-22.pdf](#)  
[Appealed Order 3 -- filed 6-5-23.pdf](#)  
[Floyd v. SSC Sumter East \(22-CP-43-00355\) -- Proof of Service for Notice of Appeal.pdf](#)

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Matt,

I hope you are doing well. As you know, I filed a Notice of Appearance in the above-referenced case today (C.A. # 2022-CP-43-00355). In this regard, please find attached the Notice of Appeal of Judge Culbertson's Orders, which are also attached, along with the Proof of Service regarding the same. Please accept this email communication, along with its attachments, as service on you and your clients.

We will subsequently file the Notice of Appeal with the Court of Appeals and Circuit Court within 10 days, accordingly.

I look forward to working with you in this matter.

Sincerely,

**David L. Williford | Huff Powell Bailey**

**Greenville** | Atlanta | Columbus | Gainesville | Raleigh | Savannah

**15 S. Main Street, Suite 602 | Greenville, SC 29601**

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NOTE: Please send correspondence and documents to us electronically, not by U.S. Mail, to the extent possible.