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Aug 10 2023

SC Court of Appeals

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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Colleton County
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

Case No. 2021-CP-15-00516

Gabrielle Washington
as Personal Representative of the Estate of Walter Washington, Jr.,

Respondent,

v.

St. George Health Care, LLC, d/b/a St. George Healthcare Center and
Walterboro Community Hospital, Inc., d/b/a Colleton Medical Center,

Defendants,

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

Appellant.

NOTICE OF APPEAL

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)

Gaillard T. Dotterer, III (SC Bar No. 103620)

Russell G. Hines (SC Bar No. 72100)

25 Calhoun Street, Suite 400

P.O. Box 993 (29402)

Charleston, South Carolina 29401

(843) 720-5488

Attorneys for Appellant

Other Counsel of Record:

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John E. Parker, Jr. (SC Bar No. 104225)
PARKER LAW GROUP, LLP
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P.O. Box 487
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-and-

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(803) 268-9800

*Attorneys for Respondent
Gabrielle Washington as Personal Representative
of the Estate of Walter Washington, Jr.*

Emily Collins Brown (SC Bar No. 100030)
Weldon R. Johnson (SC Bar No. 3061)
Creasie Parrott Schlachter (SC Bar No. 103677)
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Columbia, South Carolina 29201
(803) 799-1111

*Attorneys for Defendant
Walterboro Community Hospital, Inc.,
d/b/a Colleton Medical Center*

Defendant/Appellant St. George Health Care, LLC, d/b/a St. George Healthcare Center (“St. George”), hereby appeals the following orders of the Honorable Bentley D. Price, Circuit Court Judge:

- **Order [Denying St. George’s Motion to Compel Arbitration]**, filed December 7, 2022, and
- **Order Denying Facility’s Motion to Alter, Amend, and/or Reconsider Order Denying Motion to Compel Arbitration**, filed July 11, 2023.

Copies of the appealed orders are attached hereto and incorporated herein by reference. St. George received written notice of entry of the most recent order on July 11, 2023.

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)
James D. Gandy, III (SC Bar No. 11925)
Gaillard T. Dotterer, III (SC Bar No. 103620)
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Attorneys for Appellant

Charleston, South Carolina

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Defendants,

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

Appellant.

PROOF OF SERVICE

CLEMENT RIVERS, LLP

Stephen L. Brown (SC Bar No. 66468)

D. Jay Davis, Jr. (SC Bar No. 12084)

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Charleston, South Carolina 29401

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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 on Defendant Walterboro Community Hospital, Inc., d/b/a Colleton Medical Center, on August 10, 2023, by emailing (see attached email) a copy of the same to their following counsel of record:

PARKER LAW GROUP, LLP
Lee D. Cope, Esquire
lcope@parkerlawgroupsc.com
John E. Parker, Jr., Esquire
jayparker@parkerlawgroupsc.com

-and-

LANIER & BURROUGHS, LLC
Shane M. Burroughs, Esquire
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*Attorneys for Respondent
Gabrielle Washington as Personal Representative
of the Estate of Walter Washington, Jr.*

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Creasie Parrott Schlachter, Esquire
creasie@basjlaw.com
*Attorneys for Defendant
Walterboro Community Hospital, Inc., d/b/a Colleton Medical Center*

I also certify that a copy of Appellant's **NOTICE OF APPEAL** was today, August 10, 2023, 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 the above-identified counsel of record via the E-Filing System.

<**SIGNED ON THE FOLLOWING PAGE**>

Respectfully submitted,
CLEMENT RIVERS, LLP

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

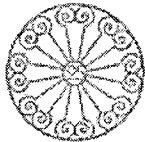
Charleston, South Carolina

August 10, 2023

From: [Hines, Russell](#)
To: [Lee Cope](#); [Jay Parker](#); "[shane@landblawfirm.com](#)"; "[weldon@basilaw.com](#)"; "[emily@basilaw.com](#)"; "[creasie@basilaw.com](#)"
Cc: [Shanna Jarrell](#); "[Brown, Steve](#)"; [Davis, Jay](#); [Gandy, III, James D. \(Tripp\)](#); [Dotterer III, Gaillard T. \(Gilly\)](#); [Wakeham, Rebecca \(Becky\)](#); [Peterson, Susan](#); [Justman, Aimee](#); [Bell, Pollyana \(Polly\)](#)
Subject: Washington v. St. George (Case No. 2021-CP-15-00516) -- Notice of Appeal
Date: Thursday, August 10, 2023 12:53:47 AM
Attachments: [image001.png](#)
[Washington v. St. George \(Case No. 2021-CP-15-00516\) -- Notice of Appeal.pdf](#)
[Appealed Order No. 1 -- Filed 12-7-22 -- Order Denying Motion to Compel Arbitration.pdf](#)
[Appealed Order No. 2 -- Filed 7-11-23 -- Order Denying Motion to Reconsider.pdf](#)

Attached for service in the above-referenced matter please find our **Notice of Appeal** and copies of the **appealed orders** attached thereto.

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: 2021CP1500516

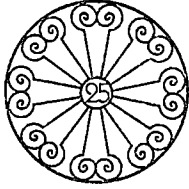
Official File Stamp: 08-10-2023 12:57:41 AM
Court: CIRCUIT COURT
Common Pleas
Colleton
Case Caption: Gabrielle Washington , plaintiff, et al VS St George Health Care Llc , defendant, et al
Document(s) Submitted: Appeal/Notice of Appeal to Court of Appeals
- Exhibit/Filing of Exhibits
- Exhibit/Filing 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:

Edward K. Pritchard, III
Melvin Wayne Cockrell, III
Russell Grainger Hines for St George Health Care Llc, St George Healthcare Center
John Elliott Parker, Jr. for Gabrielle Washington et al
Donald Jay Davis, Jr. for St George Health Care Llc, St George Healthcare Center
Emily Collins Brown for Colleton Medical Center, Walterboro Community Hospital Inc
Weldon R. Johnson for Colleton Medical Center, Walterboro Community Hospital Inc
Creasie Parrott Schlachter for Colleton Medical Center, Walterboro Community Hospital Inc
Shane Morris Burroughs for Gabrielle Washington, Walter Washington, Jr
Lee Deer Cope for Gabrielle Washington, Walter Washington, Jr

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



CLEMENT RIVERS, LLP
ATTORNEYS AT LAW

Pollyana Bell
Project Assistant

Direct Dial: (843) 720-5488
Direct Fax: (843) 579-1369
E-mail: pbell@ycrlaw.com

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AUG 14 2023

SC Court of Appeals

VIA US MAIL

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Gabrielle Washington as Personal Representative of the Estate of Walter Washington, Jr. vs. St. George Health Care, LLC, d/b/a St. George Health Care Center and Walterboro Community Hospital, Inc., d/b/a Colleton Medical Center
Case No.: 2021-CP-15-00516
YCR File: 14347-20210566

Dear Ms. Kitchings:

Enclosed please find our firm's check representing the filing for Appellant's Notice of Appeal, which was electronically filed on August 10, 2023, in the above-referenced matter.

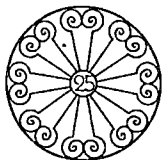
With best wishes and kindest regards, I am

Sincerely,

CLEMENT RIVERS, LLP

Pollyana Bell
Project Assistant

/pbb
Enclosures



CLEMENT RIVERS, LLP

P.O. Box 993
Charleston, SC 29402

RGH
20210566

Jenny Abbott Kitchings, Clerk of Court
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