

**RECEIVED**

**Nov 01 2023**

**SC Court of Appeals**

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

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Appeal from Marion County  
Court of Common Pleas

H. Steven DeBerry IV, Circuit Court Judge

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Case No. 2022-CP-33-00183

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Rebecca C. Hagood  
as Personal Representative of the Estate of Frank D. Chavis, Sr.,

Respondent,

v.

Palmetto Faith Operating, LLC  
d/b/a Faith Healthcare Center and  
Brooks Arnette,

Appellants.

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**NOTICE OF APPEAL**

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CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
Matthew O. Riddle (SC Bar No. 76650)  
Kara S. Grevey (SC Bar No. 101742)  
Russell G. Hines (SC Bar No. 72100)  
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*Attorneys for Appellants*

**Other Counsel of Record:**

A. Keith McAlister Jr. (SC Bar No. 78213)

HAWK LAW GROUP

156 Laurens Street NW

Aiken, South Carolina 29801

(803) 226-9089

*Attorney for Respondent*

Defendants/Appellants, Palmetto Faith Operating, LLC d/b/a Faith Healthcare Center and Brooks Arnette (collectively, “Appellants”), hereby appeal the following orders of the Honorable H. Steven DeBerry IV, Circuit Court Judge:

- **Order Denying Defendants’ Motions to Compel Arbitration**, filed September 8, 2023; and
- **Order Denying Defendants’ Motion for Reconsideration**, filed October 2, 2023.

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 October 2, 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)  
Matthew O. Riddle (SC Bar No. 76650)  
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*Attorneys for Appellants*

Charleston, South Carolina

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Appellants.

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**PROOF OF SERVICE**

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CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
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*Attorneys for Appellants*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that Appellants' **NOTICE OF APPEAL** was served on Respondent on November 1, 2023, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

A. Keith McAlister Jr., Esquire  
HAWK LAW GROUP  
[kmcaster@hawklawgroup.com](mailto:kmcaster@hawklawgroup.com)

*Attorney for Respondent*

I further certify that a copy of Appellants' **NOTICE OF APPEAL** was this day, November 1, 2023, E-Filed with the lower court (see attached NEF), thus also, i.e., in addition to service by email, effecting service of the notice today on Respondent's above-identified 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 Appellants*

Charleston, South Carolina

November 1, 2023

**From:** [Hines, Russell](#)  
**To:** [Kip McAlister](#)  
**Cc:** [Brown, Stephen L.](#); [Davis, Jay](#); [Riddle, Matthew](#); [Grevey, Kara S.](#); [Justman, Aimee](#); [Bell, Pollyana \(Polly\)](#); [Preiser, Skyla](#); [Peterson, Susan](#); [Wakeham, Rebecca \(Becky\)](#)  
**Subject:** Hagood v. Palmetto Faith Operating (Case No. 2022-CP-33-00183) -- Notice of Appeal  
**Date:** Wednesday, November 1, 2023 2:48:17 PM  
**Attachments:** [image001.png](#)  
[Hagood v. Palmetto \(2022-CP-33-00183\) -- Notice of Appeal.pdf](#)  
[Appealed Order 1 -- Order Denying MTCA filed 9-8-23.pdf](#)  
[Appealed Order 2 -- Order Denying MTR Order Denying MTCA filed 10-2-23.pdf](#)

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Attached for service please find Defendants' **Notice of Appeal** (and copies of the **Appealed Orders** attached thereto) in the above-referenced matter.

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

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**A filing has been submitted to the court RE:** 2022CP3300183

**Official File Stamp:** 11-01-2023 02:55:20 PM  
**Court:** CIRCUIT COURT  
Common Pleas  
Marion  
**Case Caption:** Frank D Chavis Sr , plaintiff, et al VS Palmetto Faith Operating, 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.

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**The following people were served electronically:**

Joseph Jakob Kennedy for Frank D Chavis, Sr, Rebecca C Hagood  
Russell Grainger Hines for Palmetto Faith Operating, Llc et al  
Matthew Oliver Riddle for Palmetto Faith Operating, Llc et al  
Donald Jay Davis, Jr. for Palmetto Faith Operating, Llc et al  
William John Tuck for Frank D Chavis, Sr, Rebecca C Hagood  
Kara Shea Grevey for Palmetto Faith Operating, Llc et al  
Allen Keith McAlister, Jr. for Frank D Chavis, Sr et al

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