

**RECEIVED**

**Apr 05 2024**

**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  
Appellate Case No. 2023-001712

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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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**APPELLANTS' 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)  
Matthew O. Riddle (SC Bar No. 76650)  
Kara S. Grevey (SC Bar No. 101742)  
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*Attorneys for Appellants*

Appellants, Palmetto Faith Operating, LLC d/b/a Faith Healthcare Center and Brooks Arnette, proposes the following to be included in the Record on Appeal, with duplicative material (e.g., the Arbitration Agreement) to appear in the record only once:

### **Orders**

1. Order Denying Defendants' Motions to Compel Arbitration, filed September 8, 2023;
2. Order Denying Defendants' Motion to Reconsider, filed October 2, 2023;

### **Pleadings**

3. Summons and Complaint, filed April 4, 2022;
  - a. Affidavit of Karen Coleman;
4. Amended Complaint for Damages, filed May 20, 2022;
5. Defendant Palmetto Faith Operating, LLC d/b/a Faith Healthcare Center's Answer to Plaintiff's Amended Complaint, filed June 8, 2022;
6. Defendant Brooks Arnette's Answer to Plaintiff's Amended Complaint, filed June 8, 2022;

### **Transcripts**

7. August 21, 2023 Hearing Transcript;

### **Motions, Memoranda, and Other Material**

8. Palmetto Faith Operating, LLC d/b/a Faith Healthcare Center's Motion to Compel Arbitration, dated July 13, 2022;
  - a. Exhibit A, Arbitration Agreement;

9. Brooks Arnette's Motion to Compel Arbitration, dated July 13, 2022;
  - a. Exhibit A, Arbitration Agreement;
10. Defendants' Memo in Support of Motion to Compel Arbitration, filed August 18, 2023;
  - a. Exhibit 1, Admission Agreement;
  - b. Exhibit 2, Readmission Agreement;
  - c. Exhibit 3, Arbitration Agreement;
11. Plaintiff's Response in Opposition to Defendants Palmetto Faith Operating, LLC and Brooks Arnette's Motions to Compel Arbitration, filed August 18, 2023;
12. Motion to Alter, Amend, and/or Reconsider Order denying Defendants' Motions to Compel Arbitration, filed September 18, 2023;
13. Notice of Appeal (omitting Orders) and Proof of Service, filed November 1, 2023;

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

**<SIGNED ON THE FOLLOWING PAGE>**

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
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April 5, 2024