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Jan 13 2025

SC Court of Appeals

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

Appeal from Charleston County
Court of Common Pleas

J. Cordell Maddox Jr., Circuit Court Judge

Case No. 2022-CP-10-00483

Fernesha Mazyck,
as Personal Representative of the Estate of Ida Braggs,

Respondent,

v.

THI of South Carolina a Charleston, LLC,
d/b/a Riverside Health and Rehab,

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)
Russell G. Hines (SC Bar No. 72100)
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P.O. Box 993 (29402)
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(843) 720-5488

Attorneys for Appellant

Other Counsel of Record:

Grahame E. Holmes (SC Bar No. 68842)

PARKER LAW GROUP, LLP

P.O. Box 1164

Walterboro, South Carolina 29488

(843) 549-9544

Attorney for Respondent

Defendant/Appellant, THI of South Carolina at Charleston, LLC d/b/a Riverside Health and Rehab (“Appellant”), hereby appeals the following orders of the Honorable J. Cordell Maddox Jr., Circuit Court Judge:

- **Order filed November 15, 2024, Denying Appellant’s Motion to Compel Arbitration and, in turn, Granting Plaintiff’s Motion to Compel Discovery Responses; and**
- **Order filed December 13, 2024, Denying Appellant’s Motion to Alter, Amend, and/or Reconsider Order Denying Appellant’s Motion to Compel Arbitration.**

Copies of the appealed orders are attached hereto and incorporated herein by reference. Appellant received written notice of entry of the most recent order on December 13, 2024.

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)
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Attorneys for Appellant

Charleston, South Carolina

January 13, 2025

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Appellant.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
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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 on January 13, 2025, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

Grahame E. Holmes, Esquire
PARKER LAW GROUP, LLP
gholmes@parkerlawgroupsc.com

Attorney for Respondent

I also certify that a copy of Appellant's **NOTICE OF APPEAL** was today, January 13, 2025, 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.

Respectfully submitted,
CLEMENT RIVERS, LLP

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

Attorneys for Appellant

Charleston, South Carolina

January 13, 2025

From: [Hines, Russell](#)
To: gholmes@parkerlawgroupsc.com
Cc: [Brown, Stephen L.](#); [Davis, Jay](#); [Gandy, III, James D. \(Tripp\)](#); [Bell, Pollyana \(Polly\)](#); [Justman, Aimee](#); [Peterson, Susan](#); [Preiser, Skyla](#); [Eversole, Amy R.](#)
Subject: Mazyck v. Riverside (Case No. 2022-CP-10-00483) -- Notice of Appeal
Date: Monday, January 13, 2025 12:08:09 PM
Attachments: [image001.png](#)
[Mazyck v. Riverside \(Case No. 2022-CP-10-00483\) -- Notice of Appeal.pdf](#)
[Appealed Order 1 -- 2024 11-15 -- Order Denying MTCA.pdf](#)
[Appealed Order 2 -- 2024 12-13 -- Order Denying MTR.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: 2022CP1000483

Official File Stamp: 01-13-2025 12:10:33 PM
Court: CIRCUIT COURT
Common Pleas
Charleston
Case Caption: Fernesha Mazyck , plaintiff, et al VS Thi Of South Carolina At Charleston 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:

Donald Jay Davis, Jr. for Thi Of South Carolina At Charleston Llc et al
James D. Gandy, III for Thi Of South Carolina At Charleston Llc et al
Russell Grainger Hines for Thi Of South Carolina At Charleston Llc et al
Grahame Ellison Holmes for Fernesha Mazyck, Ida Braggs

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

Fernesha Mazyck Personal Representative
Ida Braggs Estate