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**Feb 07 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas  
The Honorable Jocelyn Newman, Circuit Court Judge

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Civil Action No.: 2023CP4003086  
Appeal Case Number: 2024-001802

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Jennifer Murphy, as Personal Representative of the Estate of Phyllis Gee.....Appellant,

v.

All Seasons Healthcare, LLC, All Seasons Healthcare, Inc., and TWG Polo Road, LLC d/b/a Mill  
Creek Manor, LLC f/k/a Amara Place at Columbia .....Defendants,

Of whom All Seasons Healthcare, LLC is the.....Respondent.

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**APPELLANT’S DESIGNATION OF MATTER**

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ATTORNEY FOR RESPONDENT

ATTORNEYS FOR APPELLANTS

Pursuant to Rule 209, SCACR, Appellant Jennifer Murphy, as Personal Representative of the Estate of Phyllis Gee, designates the following material to be included in the Record on Appeal:

Pleadings:

1. Notice of Intent with Affidavit filed in Greenwood County
2. Notice of Intent with Affidavit filed in Richland County
3. Summons and Complaint
4. Answer

Motions and Memoranda:

5. Respondent's Motion for Summary Judgment filed August 23<sup>rd</sup>, 2023
6. Appellant's Response to Motion for Summary Judgment filed March 7<sup>th</sup>, 2024 with exhibits
7. Respondent's Memorandum in Support of Motion for Summary Judgment filed March 12<sup>th</sup>, 2024 with exhibits
8. Appellant's supplemental Memorandum in Opposition to Respondent's Motion for Summary Judgment filed April 15<sup>th</sup>, 2024 with exhibits
9. Appellant's Supplemental Memorandum filed April 18<sup>th</sup>, 2024 with exhibits
10. Appellant's Motion to Alter or Amend the Judgment filed May 23<sup>rd</sup>, 2024 with exhibits

Orders

11. Order granting transfer of Notice of Intent from Greenwood to Richland County
12. Order granting Respondent's Motion for Summary Judgment filed May 13<sup>th</sup>, 2024
13. Form 4 order denying Appellant's Motion to Alter or Amend the Judgment

Other

14. Transcript of hearing on Motion for Summary Judgment held April 17<sup>th</sup>, 2024
15. Proof of Service of Notice of Intent
16. Proof of Service of Summons and Complaint
17. Proof of ADR
18. Affidavit of Elizabeth Moultrie with exhibits
19. Respondent's Proposed Order granting Summary Judgment filed April 22<sup>nd</sup>, 2024
20. Email serving Motion to Alter or Amend on presiding judge

*[Signature appears on the following page.]*

s/Jamie Rae Rutkoski

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Creek Manor, LLC f/k/a Amara Place at Columbia .....Defendants,

Of whom All Seasons Healthcare, LLC is .....Respondent.

**PROOF OF SERVICE**

I certify that I have served the **Appellant’s Designation of Matter** on Respondent, by  
emailing a copy of same on the 7<sup>th</sup> day of **February 2025** addressed to its attorney of record,  
Julius W. McKay II at [jmckay@mckayfirm.com](mailto:jmckay@mckayfirm.com) .

Elizabeth C. Moultrie, Senior Paralegal  
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February 7, 2025

Columbia, South Carolina.