

**RECEIVED**

**Feb 27 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM GREENVILLE COUNTY  
PERRY H. GRAVELY, CIRCUIT COURT JUDGE  
Case No. 2022-CP-23-04055

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Stacey Grist as Agent under a Power of Attorney for  
Stanford W. Grist and as Trustee of the Second Amended  
Trust of Stanford W. Grist living Trust dated December 5, 2005,  
Stanford Grist Veterinary Services, LLC, Chestnut Ridge Farm, LLC,  
And Hilly Street, LLC,..... Appellants,

v.

Priscilla Mickie Grist, Caroline York Grist Lyon,  
Leyland H. Lyon, Jr., Jennifer Browning, Browning  
Geriatrics Consulting, LLC, Tracy Parson, Kiki’s Kare, LLC  
d/b/a Comfort Keepers, Erin Couchell Individually and as a  
member of Kiki’s Kare, Chris Couchell individually and as a  
member of Kiki’s Kare, LLC, and Kerry Burnett McCreary, Defendants,

Of which Jennifer Browning and Browning Geriatrics  
Consulting, LLC are the, ..... Respondents.

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**NOTICE OF APPEAL**

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Appellants Stacey Grist as Agent under a Power of Attorney for Stanford W. Grist and Trustee of the Second Amended Trust of Stanford W. Grist living Trust dated December 5, 2005, Stanford Grist Veterinary Services, LLC, Chestnut Ridge Farm, LLC, and Hilly Street, LLC (hereafter “Appellants”) appeal from the trial court’s (1) Order Granting Defendants Jennifer Browning and Browning Geriatrics Consulting, LLC’s Motion for Summary Judgment that was filed January 6, 2025, which was received by Appellants on January 6, 2025. Appellants also appeal from the trial court’s (2) Form 4 Order filed January 30, 2025, which was received by Appellants on January 30, 2025

Respectfully submitted,

s/ Haley Hubbard

Desa Ballard (S.C. Bar No. 498)

Harvey M. Watson III (S.C. Bar No. 74053)

Haley Hubbard (S.C. Bar No. 103195)

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ATTORNEYS FOR APPELLANTS

February 27, 2025

Other counsel of record:

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ATTORNEY FOR RESPONDENTS

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And Hilly Street, LLC, ..... Appellants,


v.

Priscilla Mickie Grist, Caroline York Grist Lyon,  
Leyland H. Lyon, Jr., Jennifer Browning, Browning  
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d/b/a Comfort Keepers, Erin Couchell Individually and as a  
member of Kiki’s Kare, Chris Couchell individually and as a  
member of Kiki’s Kare, LLC, and Kerry Burnett McCreary, Defendants,  
Of which Jennifer Browning and Browning Geriatrics  
Consulting, LLC are the, ..... Respondents.

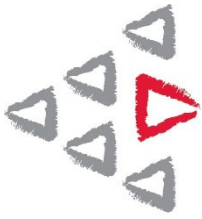
**PROOF OF SERVICE**

I, Beth Cogan, an employee with Ballard & Watson, do hereby certify that on February 27,  
2025, I served a copy of the **Notice of Appeal**, in the above-captioned case on the following  
individuals by electronic mail using their email address listed in the Attorney Information System,  
addressed as follows:

**Fred W. “Trey” Suggs, Esquire**  
**CASSIDY COATES PRICE, P.A.**  
**tsuggs@cassidycoates.com**

  
Beth Cogan, Paralegal

February 27, 2025



**Ballard & Watson**  
Attorneys at Law  
PERSISTENT. UNWAVERING.

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February 27, 2025

Via Email ([ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org))  
The Honorable Jenny Abbot Kitchings  
Court of Appeals Clerk of Court  
Post Office Box 11629  
Columbia, South Carolina 29211

**RECEIVED**  
**Feb 27 2025**  
**SC Court of Appeals**

Re: *Stacey Grist, et al. v. Priscilla Mickie Grist, et. al.*  
Case No.: 2022-CP-23-04055

Dear Ms. Kitchings:

Enclosed for filing, please find a Notice of Appeal and Proof of Service for the above-referenced matter. Pursuant to paragraph (3)(c) of the Supreme Court's amended administrative order dated May 6, 2022 ("Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules" originally dated August 25, 2021) a check for the filing fee is being forwarded separately via US mail.

Our office is already in possession of the October 16, 2024 transcript. According to our calculations, the Initial Brief of Appellant and Designation of matter is therefore due on Monday, March 31, 2025. If I am mistaken as to that deadline date, please inform my office as soon as possible.

By copy of this letter and as evidenced by the Proof of Service, this filing has been served upon counsel for the Respondent and is being filed with the Trial Court. If you have any questions, please do not hesitate to contact our office. With warm personal regards, I am,

Sincerely yours,

*Haley A. Hubbard*

Haley Hubbard  
haley@desaballard.com

Enclosures

cc: Via Email  
Fred W. "Trey" Suggs III, Esquire  
Stacey Grist