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**Feb 27 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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

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 Kiki’s Kare, LLC d/b/a Comfort Keepers, Erin Couchell Individually  
and a member of Kiki’s Kare and Chris Couchell Individually and as a member  
of Kiki’s Kare are the, ..... Respondents.

**NOTICE OF APPEAL**

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 Kiki’s Kare,  
LLC d/b/a Comfort Keepers, Erin Couchell individually and as a member of Kiki’s Kare and Chris  
Couchell individually and as a member of Kiki’s Kare 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 29, 2025 which was received by Appellants on January 29, 2025. Appellants also appeal from the trial court's (3) Form 4 Order filed January 30, 2025 which was received by Appellants on January 30, 2025. Appellants also appeal from the trial court's (4) Form 4 Order filed February 11, 2025 which was received by Appellants on February 11, 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)

BALLARD & WATSON  
226 State Street  
West Columbia, SC 29169  
Telephone 803.796.9299  
Facsimile 803.796.1066  
desab@desaballard.com  
harvey@desaballard.com  
haley@desaballard.com

ATTORNEYS FOR APPELLANTS

February 27, 2025

Other counsel of record:

Robert M. Peele III (S.C. Bar No. 77569)  
Jacqueline M. Pavlicek (S. C. Bar No. 100556)  
COLLINS & LACY, P.C.  
Post Office Box 12487  
Columbia, South Carolina 29211  
Telephone 803.256.2660  
Facsimile 803.771.4484  
rpeele@collinsandlacy.com  
jpavlicek@collinsandlacy.com

ATTORNEYS FOR RESPONDENTS

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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 Kiki's Kare, LLC d/b/a Comfort Keepers, Erin Couchell Individually  
and a member of Kiki's Kare and Chris Couchell Individually and as a member  
of Kiki's Kare 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:

**Robert M. Peele III, Esquire**  
**COLLINS & LACY, P.C.**  
**repeele@collinsandlacy.com**

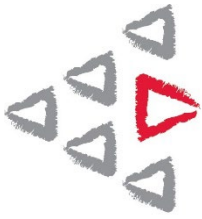
Jacqueline M. Pavlicek, Esquire  
COLLINS & LACY, P.C  
jpavlicek@collinsandlacy.com



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Beth Cogan, Paralegal

February 27, 2025



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

Desa Ballard  
Harvey M Watson III  
Haley Hubbard

226 State Street West Columbia, SC 29169  
ph 803.796.9299 | fx 803.796.1066 | desaballard.com

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

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**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  
Robert M. Peele III, Esquire  
Jacqueline M. Pavlicek, Esquire  
Stacey Grist