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Apr 21 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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

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

Jennifer Murphy, as Personal Representative of the Estate of Phyllis Gee...Plaintiff/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, Inc. is.....Respondent.

RESPONDENT’S DESIGNATION OF MATTER

Jamie Rae Rutkoski (SC Bar 103270)
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ATTORNEY FOR RESPONDENT

ATTORNEYS FOR APPELLANT

Pursuant to Rule 209, SCACR, Respondent All Seasons Healthcare Inc. designates the following material to be included in the Record on Appeal:

Pleadings:

1. Greenwood County Notice of Intent
2. Richland County Notice of Intent
3. Summons and Complaint
4. Answer of All Seasons Healthcare, Inc.

Motions and Memoranda:

5. Respondent's Motion for Summary Judgment filed August 23rd, 2023
6. Appellant's Response to Motion for Summary Judgment filed March 7th, 2024 with Exhibits
7. Respondent's Memorandum in Support of Motion for Summary Judgment filed March 12th, 2024 with exhibits
8. Appellant's supplemental Memorandum in Opposition to Respondent's Motion for Summary Judgment filed April 15th, 2024 with exhibits
9. Appellant's Supplemental Memorandum filed April 18th, 2024 with exhibits
10. Appellant's Motion to Alter or Amend the Judgment filed May 23rd, 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 13th, 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 17th, 2024
15. Notice of Intent Certificate of Service
16. Summons and Complaint Certificate of Service

17. Proof of ADR
18. Affidavit of Elizabeth Moultrie with exhibits
19. Respondent's Proposed Order granting Summary Judgment filed April 22nd, 2024
20. Email serving Motion to Alter or Amend on presiding judge
21. Affidavit of Heather McCloy
22. December 16, 2022 Return Receipt
23. June 26, 2023 Return Receipt

Respectfully submitted,

/s/Julius W. McKay, II

Julius W. McKay, II

The McKay Firm, PA

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Attorney for Respondent

Columbia, South Carolina

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

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on **April 21, 2025**, a copy of the foregoing
Respondent's Designation of Matter was duly served on Appellant at jrutkoksi@kassellaw.com,
tmcvey@kassellaw.com, and jkassel@kassellaw.com.

s/Sherri Johnson
Sherri Johnson, Paralegal to:
Julius W. McKay, II
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