

RECEIVED

May 23 2025

SC Court of Appeals

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

Appeal from Richland County
Court of Common Pleas

Robert E. Hood, Circuit Court Judge

Case No. 2023-CP-40-02608

Sallie Wilson
as Guardian for Gladys Graham,

Respondent,

v.

Medical University Hospital Authority
d/b/a MUSC Health Columbia Medical Center Northeast,
Columbia AL Operations, LLC
d/b/a Harmony Collection at Columbia (AL/MC),
and Karen Bowman,

Defendants.

Of whom Columbia AL Operations, LLC
d/b/a Harmony Collection at Columbia (AL/MC)
and Karen Bowman are

Appellants.

NOTICE OF APPEAL

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis Jr. (SC Bar No. 12084)
Matthew O. Riddle (SC Bar No. 76650)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
P.O. Box 993 (29402)
Charleston, South Carolina 29401
(843) 720-5488

Attorneys for Appellants

Other Counsel of Record:

D. Nathan Hughey (SC Bar No. 68409)
A. Stuart Hudson (SC Bar No. 71691)
Bradley H. Banyas (SC Bar No. 101668)
HUGHEY LAW FIRM, LLC
P.O. Box 348
Mount Pleasant, South Carolina 29465
(843) 881-8644

Attorneys for Respondent

G. Murrell Smith, Jr. (SC Bar No. 66263)
SMITH ROBINSON HOLLER DUBOSE AND MORGAN, LLC
P.O. Box 580
Sumter, South Carolina 29151
(803) 778-2471

-and-

Austin T. Reed (SC Bar No. 102808)
SMITH ROBINSON HOLLER DUBOSE AND MORGAN, LLC
3200 Devine Street
Columbia, South Carolina 29205
(803) 254-5445

Attorneys for Defendant
Medical University Hospital Authority
d/b/a MUSC Health Columbia Medical Center Northeast

Defendants/Appellants Columbia AL Operations, LLC d/b/a Harmony Collection at Columbia (AL/MC) and Karen Bowman (collectively, "Appellants") hereby appeal the following orders of the Honorable Robert E. Hood, Circuit Court Judge:

- **Order filed March 26, 2025, denying Appellants' Motion to Compel Arbitration;** and
- **Order filed April 23, 2025, denying Appellants' Motion to Alter, Amend, and/or Reconsider.**

Copies of the appealed orders are attached hereto and incorporated herein by reference. Appellants received written notice of entry of the most recent order on April 23, 2025.

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)
Matthew O. Riddle (SC Bar No. 76650)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
P.O. Box 993 (29402)
Charleston, South Carolina 29401
(843) 720-5488
Attorneys for Appellants

Charleston, South Carolina

May 23, 2025

RECEIVED

May 23 2025

SC Court of Appeals

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

Appeal from Richland County
Court of Common Pleas

Robert E. Hood, Circuit Court Judge

Case No. 2023-CP-40-02608

Sallie Wilson
as Guardian for Gladys Graham,

Respondent,

v.

Medical University Hospital Authority
d/b/a MUSC Health Columbia Medical Center Northeast,
Columbia AL Operations, LLC
d/b/a Harmony Collection at Columbia (AL/MC),
and Karen Bowman,

Defendants.

Of whom Columbia AL Operations, LLC
d/b/a Harmony Collection at Columbia (AL/MC)
and Karen Bowman are

Appellants.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis Jr. (SC Bar No. 12084)
Matthew O. Riddle (SC Bar No. 76650)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
P.O. Box 993 (29402)
Charleston, South Carolina 29401
(843) 720-5488

Attorneys for Appellants

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that Appellants' **NOTICE OF APPEAL** was served on Respondent, as well as on Defendant Medical University Hospital Authority d/b/a MUSC Health Columbia Medical Center Northeast, on May 23, 2025, by emailing (see attached email) a copy of the same to their counsel of record:

D. Nathan Hughey, Esquire
nate@hugheyfirm.com
A. Stuart Hudson, Esquire
stuart@hugheyfirm.com
Bradley H. Banyas, Esquire
brad@hugheyfirm.com
HUGHEY LAW FIRM, LLC
Attorneys for Respondent

G. Murrell Smith, Jr., Esquire
murrell@smithrobinsonlaw.com
Austin T. Reed, Esquire
austin.reed@smithrobinsonlaw.com
SMITH ROBINSON HOLLER DUBOSE
AND MORGAN, LLC
*Attorneys for Defendant
Medical University Hospital Authority
d/b/a MUSC Health Columbia Medical Center
Northeast*

I also certify that a copy of Appellants' **NOTICE OF APPEAL** was today, May 23, 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 all 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 Appellants

Charleston, South Carolina

May 23, 2025

Hines, Russell

From: Hines, Russell
Sent: Friday, May 23, 2025 1:04 PM
To: Nate Hughey; Stuart Hudson; Brad Banyas; Murrell Smith; Austin Reed
Cc: Brown, Stephen L.; Davis, Jay; Riddle, Matthew; Justman, Aimee; Bell, Pollyana (Polly); Peterson, Susan; Eadie, Christine
Subject: Wilson v. MUHA (2023-CP-40-02608) -- Notice of Appeal
Attachments: Wilson v. MUHA (2023-CP-40-02608) -- Notice of Appeal.pdf; Appealed Order 1 -- 2025 03-26 -- Order Denying MTCA.pdf; Appealed Order 2 -- 2025 04-23 -- Order Denying MTR.pdf

Attached for service in the above-referenced matter please find Columbia AL Operations, LLC d/b/a Harmony Collection at Columbia (AL/MC) and Karen Bowman's **Notice of Appeal** and copies of the **Appealed Orders** attached thereto.

Russell G. Hines
CLEMENT RIVERS, LLP
www.ycrlaw.com
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
Phone: (843) 720-5488
Fax: (843) 579-1327
Email: rhines@ycrlaw.com



CLEMENT RIVERS, LLP

25 Calhoun Street • Suite 400 • Charleston, SC 29401
ycrlaw.com



***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2023CP4002608

Official File Stamp: 05-23-2025 12:59:07 PM
Court: CIRCUIT COURT
Common Pleas
Richland
Case Caption: Sallie Wilson , plaintiff, et al vs Medical University Hospital Authority , defendant, et al
Event(s): Notice/Notice of Appearance
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:

Bradley Hunter Banyas for Sallie Wilson et al
Donald Jay Davis, Jr. for Columbia AI Operations Llc, Harmony Collection At Columbia (AI/Mc), Karen Bowman
Matthew Oliver Riddle for Columbia AI Operations Llc, Harmony Collection At Columbia (AI/Mc), Karen Bowman
Daniel Nathan Hughey for Sallie Wilson, Gladys Graham
Austin Tyler Reed for Musc Health Columbia Medical Center Northeast, Medical University Hospital Authority, Musc Health Columbia Medical Center Downtown
George Murrell Smith, Jr. for Musc Health Columbia Medical Center Northeast, Medical University Hospital Authority, Musc Health Columbia Medical Center Downtown

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