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**Sep 12 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

Maite Murphy, Circuit Court Judge

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Appellate Case No. 2025-000275

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James Graham, as Personal Representative of the Estate of  
Phyllis Chestnut, ..... Respondent,

v.

Hallmark Long Term Care, LLC d/b/a Hallmark Healthcare Center,  
Fundamental Long Term Care, Inc., THI of South Carolina, LLC, THI of  
Baltimore, Inc., Hunt Valley Holdings, LLC, Fundamental Administrative  
Services, LLC, Fundamental Clinical and Operational Services, LLC,  
Fundamental Clinical Consulting, LLC, and Curana Health of South  
Carolina, P.C. f/k/a Elite Patient Care of South Carolina, PC, ..... Defendants,

of which Hallmark Long Term Care, LLC d/b/a Hallmark Healthcare  
Center, THI of South Carolina, LLC, THI of Baltimore, Inc., Hunt Valley  
Holdings, LLC, Fundamental Administrative Services, LLC, Fundamental  
Clinical and Operational Services, LLC, and Fundamental Clinical Consulting,  
LLC, are the ..... Appellants.

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**RESPONDENT'S DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

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AND

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ATTORNEYS FOR RESPONDENT

Respondent designates the following items for inclusion in the Record on Appeal, in addition to any materials designated by the Appellants.

1. Plaintiff's Memorandum in Opposition to Defendant's Motion to Compel Arbitration, filed September 3, 2024;
  - a. Exhibit 1, Trahan Affidavit
2. Affidavit of James Graham, filed September 3, 2024; and
3. Plaintiff's Memo in Opposition to Defendant's Motion for Reconsideration, filed December 20, 2024;
  - a. Exhibit A, Email;
  - b. Exhibit B, Orders.

I certify that this designation contains no matter which is irrelevant to this appeal.

By: /s/John E. Parker, Jr.

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ATTORNEYS FOR RESPONDENT

September 12, 2025  
Hampton, South Carolina

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Inc., Hunt Valley Holdings, LLC, Fundamental Administrative Services, LLC,  
Fundamental Clinical and Operational Services, LLC, Fundamental Clinical  
Consulting, LLC, and Curana Health of South Carolina, P.C. f/k/a Elite Patient Care  
of South Carolina, PC, ..... Defendants,

Of which Hallmark Long Term Care, LLC d/b/a Hallmark Healthcare Center,  
THI of South Carolina, LLC, THI of Baltimore, Inc., Hunt Valley Holdings, LLC,  
Fundamental Administrative Services, LLC, Fundamental Clinical and Operational  
Services, LLC, and Fundamental Clinical Consulting, LLC, are the ..... Appellants.

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**PROOF OF SERVICE**

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The undersigned certifies that a copy of the Respondent's Designation of  
Matter to be Included in Record of Appeal has been served upon the following counsel  
of record by emailing a copy of the same 12<sup>th</sup> day of September 2025.

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ATTORNEYS FOR RESPONDENT

September 12, 2025  
Hampton, South Carolina