

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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SC Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
Diane Schafer Goodstein, Circuit Court Judge

Case No.: 2011-CP-38-1513

Bertha Tyler, as Guardian of Henrietta Mayes, Appellant,

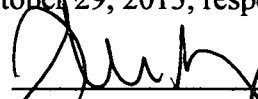
v.

Uni-Health Post-Acute Care-Orangeburg,
LLC and Catherine Pavlick, Respondents.

NOTICE OF APPEAL

Plaintiff/Appellant appeals the Honorable Diane Schafer Goodstein's October 11, 2013 Order Granting Defendant's Motion for Reconsideration and Granting Defendant's Motion to Compel Arbitration (attached as Exhibit "A") and the Honorable Diane Schafer Goodstein's October 17, 2013 Order Denying Plaintiff's Motion to Reconsider her Order Granting Defendant's Motion for Reconsideration and Granting Defendant's Motion to Compel Arbitration (attached as Exhibit "B"). Appellant received written notice of the entry of these Orders on October 21, 2013 and October 29, 2013, respectively.

November 6, 2013


John D. Kassel, Esquire (SC Bar 03268).
Theile B. McVey, Esquire (SC Bar 16682)
KASSEL McVEY, ATTORNEYS AT LAW
P O Box 1476
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Attorneys for Respondent

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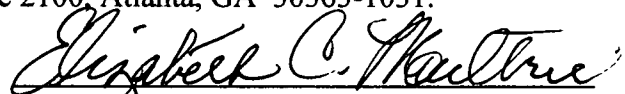
Bertha Tyler, as Guardian of Henrietta Mayes, Appellant,

v.

Uni-Health Post-Acute Care-Orangeburg,
LLC and Catherine Pavlick, Respondents.

PROOF OF SERVICE

I certify that on 8 November 2013, I served the Notice of Appeal on counsel for Uni-Health Post-Acute Care-Orangeburg, LLC and Catherine Pavlick by depositing a true and correct copy of same in the United States Mail, postage prepaid, return address clearly printed on the envelope and addressed to their attorneys Tyler L. Arnold, Esquire and Jason E. Bring, Esquire, 171 17th Street NW, Suite 2100, Atlanta, GA 30363-1031.



Elizabeth C. Moultrie, Paralegal to
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Attorneys for Plaintiff/Appellant

November 8, 2013

Columbia, South Carolina.

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The Honorable Jenny A. Kitchings
South Carolina Court of Appeals
P O Box 11629
Columbia, SC 29211-1629

The Honorable Winnifa B. Clark
Orangeburg County Clerk of Court
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Orangeburg, South Carolina 29116

SC Court of Appeals

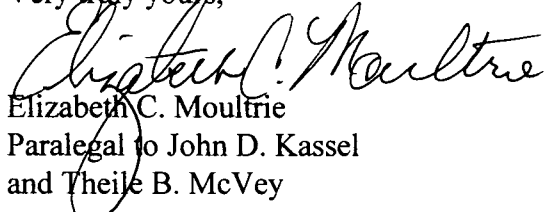
Re: *Bertha Tyler, as Guardian of Henrietta Mayes v. Uni-Health Post-Acute Care-Orangeburg and Catherine Pavlick*
C/A No.: 2011-CP-38-1513

Dear Ms. Kitchings and Ms. Clark:

Enclosed herewith please find the original and two copies of Plaintiff's Notice of Appeal in connection with the above-referenced matter, along with my Proof of Service of same on counsel for Defendants. I am also enclosing to Ms. Kitchings our firm's check in the amount of \$100.00 to cover the filing fee for this appeal. Please file the original and return the clocked copies to me in the envelope provided for your convenience. By copy of this letter, I am also providing Judge Goodstein with a copy of our Notice.

Thank you for your kind consideration and attention. If you have any questions or concerns, please do not hesitate to call.

Very truly yours,


Elizabeth C. Moultrie
Paralegal to John D. Kassel
and Theile B. McVey

:ecm

Enclosures

cc: The Honorable Diane Schafer Goodstein (w/enclosures)
Shane M. Burroughs, Esquire (w/enclosures)
Mrs. Bertha Tyler (w/o enclosures)
Tyler L. Arnold, Esquire (w/enclosures)
Jason E. Bring, Esquire (w/enclosures)

JOHN D. KASSEL, ATTORNEY AT LAW, LLC

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