

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Jennifer B. McCoy, Circuit Court Judge

Appellate Case No. 2025-000237

RECEIVED

Nov 10 2025

SC Court of Appeals

Joe Bryan,

Respondent,

v.

THI of South Carolina at Charleston, LLC d/b/a
Riverside Health and Rehab,

Appellant.

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

CLAWSON FARGNOLI UTSEY, LLC

Samuel R. Clawson, Jr. (SC# 76065)
Christy R. Fagnoli (SC# 77528)
Bert G. Utsey, III (SC# 10093)
Laura Wilkes-D'Amato (SC# 104294)
The Presqu'ile House
2 Amherst Street
Charleston, South Carolina 29403
843.970.2700

Attorneys for Respondent

Respondent Joe Bryan proposes the following to be included in the Record on Appeal, with any duplicative matter to be included in the Record on Appeal only once:

Orders

1. Order Denying Motion to Compel Arbitration, filed December 13, 2024;
2. Form 4 Order Denying Motion to Alter, Amend, and/or Reconsider, filed January 9, 2025;

Pleadings

3. Summons and Complaint, filed July 24, 2024;
4. Defendant's Answer to Plaintiff's Complaint, filed August 22, 2024;

Transcripts

5. Transcript of November 13, 2024, Hearing;

Other Materials

6. Defendant's Motion to Compel Arbitration, filed August 30, 2024;
 - a. Exhibit A, Arbitration Agreement;
7. Plaintiff's Memorandum in Opposition to Defendant's Motion to Compel Arbitration, filed November 7, 2024;
8. Memo in Support of Defendant's Motion to Compel Arbitration, filed November 8, 2024;
 - a. Exhibit 1, Signature page of Admission Agreement;
 - b. Exhibit 2, Admission Agreement Form;
 - c. Exhibit 3, Arbitration Agreement;
9. Motion to Alter, Amend, and/or Reconsider Order Denying Motion to Compel Arbitration, filed December 23, 2024;
10. Notice of Appeal (omitting appealed orders) with Proof of Service, served/filed February 7, 2025.

I certify that this Designation of Matter contains no matter which is irrelevant to this appeal.

[signature page to follow]

Respectfully submitted,

CLAWSON FARGNOLI UTSEY, LLC

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Charleston, South Carolina
November 10, 2025