

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

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Appeal from York County  
Court of Common Pleas

William A. McKinnon, Circuit Court Judge

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Case No. 2025-CP-46-04373

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Jacqueline Gibbs  
as Power of Attorney for Bonnie J. Hunter,

Respondent,

v.

THI of South Carolina at Rock Hill, LLC  
d/b/a Magnolia Manor – Rock Hill and  
THI of South Carolina, LLC,

Appellants.

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**NOTICE OF APPEAL**

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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)  
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P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Appellants*

**RECEIVED**

**May 18 2026**

**SC Court of Appeals**

**Other Counsel of Record:**

RIKARD & PROTOPAPAS, LLC  
Jescelyn Tillman Spitz (SC Bar No. 101880)  
2110 North Beltline Boulevard  
Columbia, South Carolina 29204  
P.O. Box 5640 (29250)  
(803) 968-9169

*Attorneys for Respondent*

Defendants/Appellants, THI of South Carolina at Rock Hill, LLC d/b/a Magnolia Manor – Rock Hill and THI of South Carolina, LLC (“Appellants”), hereby appeal the following order of the Honorable William A. McKinnon, Circuit Court Judge:

- **Order filed April 17, 2026, Denying Appellants’ Motions to Compel Arbitration and for a Stay.**

A copy of the appealed order is attached hereto and incorporated herein by reference. Appellants received notice of entry of the appealed order on April 17, 2026.

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)  
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*Attorneys for Appellants*

Charleston, South Carolina

May 18, 2026

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Appellants.

---

**PROOF OF SERVICE**

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CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
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*Attorneys for Appellants*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that, on May 18, 2026, Appellants' **NOTICE OF APPEAL** was served on Respondent by emailing (see attached email) a copy of the same to counsel of record:

RIKARD & PROTOPAPAS, LLC  
Jescelyn Tillman Spitz, Esquire  
[jspitz@rplegalgroup.com](mailto:jspitz@rplegalgroup.com)  
*Attorneys for Respondent*

I also certify that a copy of Appellants' **NOTICE OF APPEAL** was today, May 18, 2026, E-Filed with the lower court (see attached NEF), which also, i.e., in addition to service by email, effected service of said notice today on all counsel of record via the E-Filing System.

Respectfully submitted,

By: s/Russell G. Hines  
CLEMENT RIVERS, LLP  
Russell G. Hines (SC Bar No. 72100)  
*Attorneys for Appellants*

Charleston, South Carolina

May 18, 2026

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May 18 2026

Hines, Russell

SC Court of Appeals

**From:** Hines, Russell  
**Sent:** Monday, May 18, 2026 1:36 PM  
**To:** 'jspitz@rplegalgroup.com'  
**Cc:** Brown, Stephen L.; Davis, Jay; Riddle, Matthew; Beach, Sarah; Justman, Aimee; Peterson, Susan; Eadie, Christine  
**Subject:** Gibbs v. THI (2025-CP-46-04373) -- Notice of Appeal  
**Attachments:** Gibbs v. THI (2025-CP-46-04373) -- Notice of Appeal.pdf; Appealed Order -- Order Denying MTCA and MTS filed 4-17-26.pdf

Attached for service in the above-referenced matter please find our **Notice of Appeal** and the **Appealed Order** attached thereto.

Russell G. Hines  
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\*\*\*\*\* IMPORTANT NOTICE - READ THIS INFORMATION \*\*\*\*\*  
NOTICE OF ELECTRONIC FILING [NEF]

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**May 18 2026**

**SC Court of Appeals**

**A filing has been submitted to the court RE:** 2025CP4604373

**Official File Stamp:** 05-18-2026 01:52:19 PM  
**Court:** CIRCUIT COURT  
Common Pleas  
York

**Case Caption:** Jacqueline Gibbs , plaintiff, et al VS Thi Of South Carolina At Rock Hill Llc , defendant, et al  
**Event(s):** Notice/Notice of Appearance

**Document(s) Submitted:** Appeal/Notice of Appeal to Court of Appeals  
- 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:**

Donald Jay Davis, Jr. for Thi Of South Carolina At Rock Hill Llc et al  
Matthew Oliver Riddle for Thi Of South Carolina At Rock Hill Llc et al  
Jescelyn Tillman Spitz for Jacqueline Gibbs, Bonnie J Hunter

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

Poa For Bonnie J. Hunter