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Sep 17 2026

SC Court of Appeals

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

Appeal from Spartanburg County
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

Cases No. 2023-CP-42-04152 and 2023-CP-42-04152

Varesa Goodman,
Individually and as Personal Representative
of the Estate of Dennis Edwards,

Respondent,

v.

THI of South Carolina at Spartanburg, LLC
d/b/a Magnolia Manor-Spartanburg, Fundamental Administrative Services, LLC,
Fundamental Clinical and Operational Services, LLC, THI of Baltimore, Inc.,
THI of South Carolina, LLC, Hunt Valley Holdings, LLC, and Rusty Flathmann,

Defendants.

Of which THI of South Carolina at Spartanburg, LLC
d/b/a Magnolia Manor-Spartanburg, Fundamental Administrative Services, LLC,
Fundamental Clinical and Operational Services, LLC, THI of Baltimore, Inc.,
THI of South Carolina, LLC, and Rusty Flathmann are the

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

Attorneys for Appellants

Other Counsel of Record:

CHRISTIAN & CHRISTIAN, LLC
Matthew W. Christian (SC Bar No. 70516)
Joshua D. Christian (SC Bar No. 73820)
P.O. Box 332
Greenville, South Carolina 29602
(864) 232-7363

Attorneys for Respondent

Defendants/Appellants, THI of South Carolina at Spartanburg, LLC d/b/a Magnolia Manor-Spartanburg, Fundamental Administrative Services, LLC, Fundamental Clinical and Operational Services, LLC, THI of Baltimore, Inc., THI of South Carolina, LLC, and Rusty Flathmann (“Appellants”), hereby appeal the following orders of the Honorable J. Derham Cole, Circuit Court Judge:

- **Form 4 Order Denying Motions to Compel Arbitration and Stay, filed January 15, 2025;**
- **Formal Order Denying Motions to Compel Arbitration and Stay, filed March 31, 2025;**
- **Form 4 Order Denying Motion to Alter, Amend, and/or Reconsider Denial of Motions to Compel Arbitration and Stay, filed April 27, 2026;**
- **Formal Order Denying Motion to Alter, Amend, and/or Reconsider Denial of Motions to Compel Arbitration and Stay, filed August 18, 2026; and**
- **Formal Order Denying Motion to Alter, Amend, and/or Reconsider Denial of Motions to Compel Arbitration and Stay, filed August 24, 2026.**

Copies of the appealed orders are attached hereto and incorporated herein by reference. Appellants received written notice of entry of the most recent appealed order on August 24, 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 State Bar No. 76650)
Russell G. Hines (SC Bar No. 72100)
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Attorneys for Appellants

Charleston, South Carolina

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THI of South Carolina, LLC, Hunt Valley Holdings, LLC, and Rusty Flathmann,

Defendants.

Of which THI of South Carolina at Spartanburg, LLC
d/b/a Magnolia Manor-Spartanburg, Fundamental Administrative Services, LLC,
Fundamental Clinical and Operational Services, LLC, THI of Baltimore, Inc.,
THI of South Carolina, LLC, and Rusty Flathmann are the

Appellants.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
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D. Jay Davis, Jr. (SC Bar No. 12084)
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Attorneys for Appellants

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that, on September 17, 2026, Appellants' **NOTICE OF APPEAL** was served on Respondent by emailing (see attached email) a copy of the same to counsel of record:

CHRISTIAN & CHRISTIAN, LLC

Matthew W. Christian, Esquire

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Joshua D. Christian, Esquire

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Attorneys for Respondent

I also certify that a copy of Appellants' **NOTICE OF APPEAL** was today, September 17, 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

September 17, 2026

Hines, Russell

From: Hines, Russell
Sent: Thursday, September 17, 2026 11:41 AM
To: mchristian@cclawfirm.com; Josh Christian
Cc: Brown, Stephen L.; Davis, Jay; Riddle, Matthew; Justman, Aimee; Mammoser, Amanda; Peterson, Susan
Subject: Goodman v. THI (2023-CP-42-04152 and -04153) -- Notice of Appeal
Attachments: Goodman v. THI (2023-CP-42-04152 and -04153) -- Notice of Appeal.pdf; Appealed Order -- 2025 01-15.4152 -- Form Order Denying MTCA.pdf; Appealed Order -- 2025 01-15.4153 -- Form Order Denying MTCA.pdf; Appealed Order -- 2025 03-31.4152 -- Formal Order Denying MTCA.pdf; Appealed Order -- 2025 03-31.4153 -- Formal Order Denying MTCA.pdf; Appealed Order -- 2026 04-27.4152 -- Form Order Denying MTR Denial of MTCA.pdf; Appealed Order -- 2026 08-18.4153 -- Formal Order Denying MTR Denial of MTCA.pdf; Appealed Order -- 2026 08-24.4152 -- Formal Order Denying MTR Denial of MTCA.pdf

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

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Sep 17 2026
SC Court of Appeals



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Hines, Russell

From: efiledonotreply@sccourts.org
Sent: Thursday, September 17, 2026 11:48 AM
To: Hines, Russell
Cc: Justman, Aimee
Subject: Courtesy NEF RE: 2023CP4204152

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

A filing has been submitted to the court RE: 2023CP4204152

Official File Stamp: 09-17-2026 11:47:33 AM
Court: CIRCUIT COURT
Common Pleas
Spartanburg
Case Title: Varesa Goodman , plaintiff, et al VS Thi Of South Carolina At
Spartanburg Llc , defendant, et al
Document(s) Submitted: Appeal/Notice of Appeal to Court of Appeals
- Exhibit/Filing of Exhibits
- Exhibit/Filing of Exhibits
- Exhibit/Filing of Exhibits
- Exhibit/Filing of Exhibits
- Exhibit/Filing of Exhibits
- 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:

Russell Grainger Hines for Magnolia Manor Spartanburg, Thi Of South Carolina At Spartanburg Llc, Rusty Flathmann, Hunt Valley Holdings Llc, Thi Of South Carolina Llc, Thi Of Baltimore Inc, Fundamental Clinical And Operational Services Llc, Fundamental Administrative Services Llc
Joshua David Christian for Varesa Goodman, Personal Representative Of The Estate Of Dennis Edwards
Donald Jay Davis, Jr. for Magnolia Manor Spartanburg, Thi Of South Carolina At Spartanburg Llc, Rusty Flathmann, Thi Of South Carolina Llc, Fundamental Clinical And Operational Services Llc

Matthew Oliver Riddle for Magnolia Manor Spartanburg, Thi Of South
Carolina At Spartanburg Llc, Rusty Flathmann, Thi Of South Carolina Llc,
Fundamental Clinical And Operational Services Llc
Matthew W. Christian for Varesa Goodman

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

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Hines, Russell

From: efiledonotreply@sccourts.org
Sent: Thursday, September 17, 2026 11:52 AM
To: Hines, Russell
Cc: Justman, Aimee
Subject: Courtesy NEF RE: 2023CP4204153

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Sep 17 2026

SC Court of Appeals

***** IMPORTANT NOTICE - READ THIS INFORMATION *****

NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2023CP4204153

Official File Stamp: 09-17-2026 11:50:56 AM
Court: CIRCUIT COURT
Common Pleas
Spartanburg
Case Title: Varesa Goodman , plaintiff, et al VS Thi Of South Carolina At
Spartanburg Llc , defendant, et al
Document(s) Submitted: Appeal/Notice of Appeal to Court of Appeals
- Exhibit/Filing of Exhibits
- Exhibit/Filing of Exhibits
- Exhibit/Filing of Exhibits
- Exhibit/Filing of Exhibits
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Filed by or on behalf of: Russell Grainger Hines

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Donald Jay Davis, Jr. for Magnolia Manor Spartanburg, Thi Of South
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