

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

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Case No. 2007-CP-42-4601

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Lawrence E. Morrow and Evelyn  
M. Morrow,

Plaintiffs/Appellants

vs.

Fundamental Long-Term Care Holdings, LLC;  
Fundamental Clinical Consulting, LLC;  
Fundamental Administrative Services, LLC;  
THI of Baltimore, Inc.; THI of South Carolina,  
LLC; THI of Baltimore Management, LLC;  
THI of South Carolina at Magnolia Place at  
Spartanburg, LLC d/b/a/ Magnolia Place at Spartanburg,

Respondents

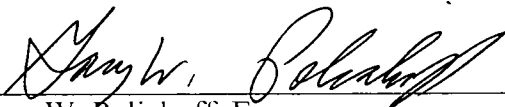
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NOTICE OF APPEAL

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Lawrence E. Morrow and Evelyn M. Morrow, hereby appeal the order [judgment] of the Honorable J. Derham Cole, dated October 24, 2011. Appellants received written notice of entry of this order [judgment] on November 14, 2011.

Nov. 21, 2011

  
\_\_\_\_\_  
Gary W. Poliakoff, Esq.  
Raymond P. Mullman, Esq.  
Poliakoff & Associates, P.A.  
P.O. Box 1571  
Spartanburg, S.C. 29304  
Telephone: 864-582-5472  
Attorney for Appellants

Other Counsel of Record:  
William L. Howard, Sr., Esq.  
P.O. Box 993  
Charleston, SC 29402  
843-577-4000  
Attorney for Respondent

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**SC Court of Appeals**

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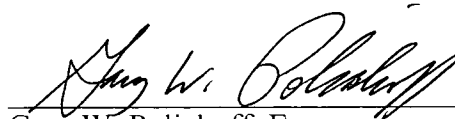
Fundamental Long-Term Care Holdings, LLC;  
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THI of Baltimore, Inc.; THI of South Carolina,  
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THI of South Carolina at Magnolia Place at  
Spartanburg, LLC d/b/a/ Magnolia Place at Spartanburg,

Respondents

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on Respondents by depositing a copy of it in the United States Mail, postage prepaid, addressed to the attorney of Record, William L. Howard, Sr., Esq., Post Office Box 993, Charleston, South Carolina 29402

Nov. 21, 2011



Gary W. Poliakov, Esq.  
Raymond P. Mullman, Esq.  
Poliakov & Associates, P.A.  
P.O. Box 1571  
Spartanburg, S.C. 29304  
Telephone: 864-582-5472  
Fax: 864-582-7280  
Attorney for Appellants

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**SC Court of Appeals**

Gary W. Poliakoff  
atty@gpoliakoff.com

Raymond P. Mullman, Jr.  
rmullmanjr@aol.com



Benard B. Poliakoff  
(1916-1955)

J. Manning Poliakoff  
(1923-1969)

Matthew Poliakoff  
(1919-1979)

November 21, 2011

The Honorable Tanya A. Gee  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: Lawrence E. Morrow and Evelyn M. Morrow, Appellants v. Fundamental Long-Term Care Holdings, LLC; Fundamental Clinical Consulting, LLC; Fundamental Administrative Services, LLC; THI of Baltimore, Inc.; THI of South Carolina, LLC; THI of Baltimore Management, LLC; THI of South Carolina at Magnolia Place at Spartanburg, LLC d/b/a/ Magnolia Place at Spartanburg, Respondents, Case No. 2007-CP-42-4601

Dear Ms. Gee:

Enclosed for filing please find our Notice of Appeal in the above case. Also enclosed are the following:

1. Proof of Service of the Notice of Appeal on the Respondents.
2. A copy of the Order and Judgments which are to be challenged on appeal.
3. Our check in the amount of \$100.00 for filing.

Thank you for your assistance.

With best regards, I am

Yours very truly,

A handwritten signature in black ink that reads "Gary W. Poliakoff". The signature is written in a cursive style.

Gary W. Poliakoff  
POLIAKOFF & ASSOCIATES, P.A.  
Attorneys for Appellants

GWP/tjd

Enclosures

cc: William L. Howard, Sr., Esq., Attorney for Respondents

Courthouse Square  
215 Magnolia Street, Spartanburg, South Carolina 29306  
Mailing Address: P.O. Box 1571, Spartanburg, South Carolina 29304  
Telephone: 864-582-5472, 864-582-8101 • Facsimile: 864-582-7280  
www.gpoliakoff.com

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