

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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JUL 24 2015

APPEAL FROM BAMBERG COUNTY
Court of Common Pleas

SC Court of Appeals

Clifton Newman, Circuit Court Judge

Case No. 2014-CP-05-17 and 19
Appellate Case No. 2015-001183

Camille Hodge, Jr., as Personal Representative of the Estate
of Mable Hodge, Deceased Respondent,

v.

UniHealth Post-Acute Care of Bamberg, LLC f/k/a Bamberg County
Nursing Center; United Health Services of South Carolina, Inc.;
United Health Services, Inc.; UHS-Pruitt Holdings, Inc. a/k/a
UHS-Pruitt Corp.; R. Dale Padgett, MD, PA; and Dr. Herbert A. Moskow,

of Whom UniHealth Post-Acute Care of Bamberg, LLC f/k/a Bamberg County
Nursing Center; United Health Services of South Carolina, Inc.;
United Health Services, Inc.; and UHS-Pruitt Holdings, Inc. a/k/a
UHS-Pruitt Corp. are Appellants.

Camille Hodge, Sr., Respondent,

v.

UniHealth Post-Acute Care of Bamberg, LLC f/k/a Bamberg County
Nursing Center; United Health Services of South Carolina, Inc.;
United Health Services, Inc.; UHS-Pruitt Holdings, Inc. a/k/a
UHS-Pruitt Corp.; R. Dale Padgett, MD, PA; and Dr. Herbert A. Moskow,

of Whom UniHealth Post-Acute Care of Bamberg, LLC f/k/a Bamberg County
Nursing Center; United Health Services of South Carolina, Inc.;
United Health Services, Inc.; and UHS-Pruitt Holdings, Inc. a/k/a
UHS-Pruitt Corp. are Appellants.

**DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

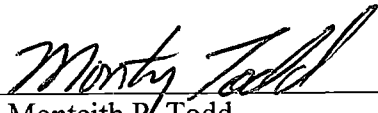
Appellants proposed the following be included in the Record on Appeal:

1. Order Denying Defendants' Motion to Dismiss or, Alternatively, to Compel Arbitration and Stay Proceedings, dated March 16, 2015, and filed March 27, 2015
2. Order Denying Defendants' Motion to Compel Deposition, dated March 16, 2015 and filed March 27, 2015
3. Order Denying Defendant UPAC's Motion for Reconsideration, dated April 30, 2015, and filed May 4, 2015
4. Transcript of Hearing on February 20, 2015
5. Complaint (Camille Hodge, Jr., as Personal Representative of the Estate of Mable Hodge, Deceased)
6. Complaint (Camille Hodge, Sr.)
7. Answer of UniHealth Post-Acute Care of Bamberg, LLC (Camille Hodge, Jr., as Personal Representative of the Estate of Mable Hodge, Deceased)
8. Answer of United Health Services, Inc. (Camille Hodge, Jr., as Personal Representative of the Estate of Mable Hodge, Deceased)
9. Answer of United Health Services of South Carolina, Inc. (Camille Hodge, Jr., as Personal Representative of the Estate of Mable Hodge, Deceased)
10. Answer of UHS Pruitt Holdings, Inc. a/k/a UHS-Pruitt Corp. (Camille Hodge, Jr., as Personal Representative of the Estate of Mable Hodge, Deceased)
11. Answer of UniHealth Post-Acute Care of Bamberg, LLC (Camille Hodge, Sr.)
12. Answer of United Health Services, Inc. (Camille Hodge, Sr.)
13. Answer of United Health Services of South Carolina, Inc. (Camille Hodge, Sr.)
14. Answer of UHS Pruitt Holdings, Inc. a/k/a UHS-Pruitt Corp. (Camille Hodge, Sr.)
15. Notice of Intent
16. Defendants' Motion to Dismiss and Compel Arbitration or, Alternatively to Compel Arbitration and Stay Proceedings (Camille Hodge, Jr., as Personal Representative of the Estate of Mable Hodge, Deceased)
17. Defendants' Motion to Dismiss and Compel Arbitration or, Alternatively to Compel Arbitration and Stay Proceedings (Camille Hodge, Sr.)
18. Memorandum in Support of Defendants' Motion to Dismiss and Compel Arbitration and or, Alternatively to Compel Arbitration and Stay Proceedings and supporting exhibits
19. Motion to Permit Deposition of Camille Hodge, Sr. on Issues Related to the Arbitration Agreement
20. Plaintiff's Memorandum in Opposition to Defendant UPAC's Motion to Compel Arbitration
21. Supplemental Materials Submitted by Defendants and Plaintiffs in Support of and in Opposition to Defendants' Motion to Dismiss and Compel Arbitration or, Alternatively, to Compel Arbitration and Stay Proceedings
22. Defendants' Notice of Motion and Motion for Reconsideration of Orders Denying Request to Depose Mr. Hodge, Sr. on Issues Limited to Arbitration and Denying Defendants' Motion to Compel Arbitration (Camille Hodge, Jr., as Personal Representative of the Estate of Mable Hodge, Deceased)

23. Defendants' Notice of Motion and Motion for Reconsideration of Orders Denying Request to Depose Mr. Hodge, Sr. on Issues Limited to Arbitration and Denying Defendants' Motion to Compel Arbitration (Camille Hodge, Sr.)
24. Notice of Appeal

Pursuant to Rule 209(c) of the South Carolina Appellate Court Rules, I certify that this Designation contains no matter which is irrelevant to this appeal.

SOWELL GRAY STEPP & LAFFITTE, LLC

BY: 
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Attorneys for Appellants

July 24, 2015

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In The Court of Appeals

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Nursing Center; United Health Services of South Carolina, Inc.;
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UHS-Pruitt Corp. are Appellants.

PROOF OF SERVICE

I, the undersigned Legal Assistant, of the law offices of Sowell Gray Stepp & Laffitte, LLC, attorneys for Appellants, do hereby certify that I have served all counsel in this action with a copy of the Designation of Matter to Be Included in the Record on Appeal by mailing a copy of same to counsel via United States Mail, postage prepaid, at the following address(es):

Counsel Served:

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*Counsel for R. Dale Padgett, MD, PA and
Dr. Herbert A. Moskow*

July 24, 2013



Robin C. Owens, Legal Assistant

July 24, 2015

VIA HAND DELIVERY

Honorable Jenny Abbott Kitchings
Clerk, SC Court of Appeals
1220 Senate Street
Columbia, SC 29201

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SC Court of Appeals

RE: Camille Hodge, Jr., as Personal Representative of the Estate Of Mable Hodge v. UniHealth Post-Acute Care of Bamberg f/k/a Bamberg County Nursing Center; United Health Services of South Carolina, Inc.; United Health Services, Inc.; UHS-Pruitt Holdings Inc. a/k/a UHS-Pruitt Corp.; R. Dale Padgett, MD, PA; and Dr. Herbert A. Moskow

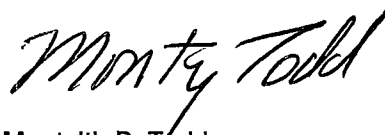
Camille Hodge, Sr. v. UniHealth Post-Acute Care of Bamberg f/k/a Bamberg County Nursing Center; United Health Services of South Carolina, Inc.; United Health Services, Inc.; UHS-Pruitt Holdings Inc. a/k/a UHS-Pruitt Corp.; R. Dale Padgett, MD, PA; and Dr. Herbert A. Moskow
Appellate Case No. 2015-001183 (Consolidated for Appeal)
Our File No. 5593/1530

Dear Ms. Kitchings:

I enclose for filing the original and one copy each of Initial Brief of Appellants and Designation of Matter to Be Included in the Record on Appeal with Rule 209 Certification in the above-captioned matter which has been consolidated for this appeal. Please return a clocked-in copy of same to me.

By copy of this letter to counsel shown below, I am serving a copy of same upon them by mail. Thank you for your assistance.

Yours truly,



Monteith P. Todd

MPT:rc0
Enclosures

cc: John C. Moylan, III, Esquire
Meliah Bowers Johnson, Esquire
James Nance, Esquire
Bakari Sellers, Esquire
J. Preston Strom, Esquire