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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

\_\_\_\_\_

Case No. 2016-001732

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NOV 18 2016

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SC Court of Appeals

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SC Court of Appeals

Hilda Stott, individually and as Personal Representative of the Estate of Jolly P. Davis, deceased,  
and as Personal Representative of the Statutory Beneficiaries, ..... Respondents,

v.

White Oak Manor, Inc.; White Oak Management, Inc.; and White Oak Manor-Spartanburg, Inc.  
d/b/a White Oak of Spartanburg, ..... Appellants.

\_\_\_\_\_

**INITIAL BRIEF OF APPELLANTS**

\_\_\_\_\_

THE WARD LAW FIRM, P.A.

John E. Rogers, II  
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d/b/a White Oak of Spartanburg, ..... Appellants.

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

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

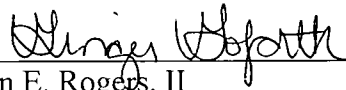
1. Order Denying White Oak's Motion to Dismiss and/or Motion to Compel Arbitration, July 29, 2016
2. Form 4 Order, July 12, 2016
3. Summons and Complaint, December 16, 2015
4. Answer, January 19, 2016
5. Motion to Dismiss and/or Motion to Compel Arbitration, January 19, 2016
6. Transcript of Motion to Compel Arbitration, March 22, 2016
7. Spartanburg Regional Medical Center Discharge Summary of Jolly Davis

8. Authorized Representative Agreement between White Oak Manor and Jolly Davis
9. Admission Agreement between White Oak Manor and Jolly Davis
10. Arbitration Agreement between White Oak Manor and Jolly Davis
11. Durable Power of Attorney for Finance of Jolly Davis, May 11, 2012
12. Health Care Power of Attorney of Jolly Davis, May 11, 2012
13. Progress Note Addressing Decisional Capacity, January 2, 2013

I certify that this designation contains no matter which is irrelevant to this appeal.

November 16, 2016

THE WARD LAW FIRM, P.A.



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NOVEMBER 16, 2016

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**SC Court of Appeals**

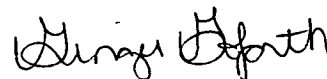
The Honorable Jenny Abbott Kitchings  
Court of Appeals Clerk of Court  
PO Box 11629  
Columbia, SC 29211

**Re: White Oak Manor, Inc., White Oak Management, Inc., and White Oak Manor-Spartanburg, Inc., d/b/a White Oak of Spartanburg, Appellants, v. Hilda S t o t t , individually and as personal representative of the Estate of Jolly P. Davis, Respondents.**

Dear Ms. Kitchings:

Enclosed please find one (1) original and one (1) copy of the Designation of Matter to be Included in the Record on Appeal of Appellants, White Oak Manor, Inc., White Oak Management, Inc., and White Oak Manor-Spartanburg, Inc., d/b/a White Oak of Spartanburg. Also please find a Certificate of Service enclosed herewith. Please file the originals and return the clocked copies to me in the postage-paid, self-addressed envelope provided.

Sincerely,



John E. Rogers, II  
Ginger D. Goforth

GDG/prm  
Enclosure

cc: Raymond P. Mullman, Jr., Esquire  
Gary W. Poliakoff, Esquire