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

Appeal from Oconee County
Court of Common Pleas

R. Scott Sprouse, Circuit Court Judge

Case No. 2018-CP-37-00271

RECEIVED
NOV 26 2018
SC Court of Appeals

Betty Herrington,

Respondent,

v.

SSC Seneca Operating Company, LLC,
d/b/a Seneca Health & Rehabilitation Center;
SavaSeniorCare, LLC; SSC Equity Holdings, LLC;
SavaSeniorCare Administrative Services, LLC;
SavaSeniorCare Consulting Services, LLC,

Defendants,

Of whom SSC Seneca Operating Company, LLC,
d/b/a Seneca Health & Rehabilitation Center;
SavaSeniorCare Administrative Services, LLC; and
SavaSeniorCare Consulting Services, LLC,

Appellants.

NOTICE OF APPEAL

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
Perry M. Buckner, IV (SC Bar No. 100031)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29402
P.O. Box 993 (29402)
843-720-5488

Attorneys for Appellants

By and through their undersigned counsel, Plaintiffs SSC Seneca Operating Company, LLC, d/b/a Seneca Health & Rehabilitation Center; SavaSeniorCare Administrative Services, LLC; and SavaSeniorCare Consulting, LLC¹ (collectively, “Appellants”), hereby appeal the following orders of the Honorable R. Scott Sprouse, Circuit Court Judge, in the above-named action:

- The **order filed/entered October 11, 2018**, denying Appellants’ motions to compel arbitration (a copy of this appealed order is attached hereto as Exhibit A, which is incorporated herein by reference); and
- Each of the **three (3) orders filed/entered October 26, 2018**, denying, respectively, Appellants’ motions to reconsider, alter, and/or amend regarding the order of October 11, 2018 (copies of these appealed orders are attached hereto as Exhibits B, C, and D, respectively, which are incorporated herein by reference).

Appellants received written notice of entry of the most recent orders, i.e., the three (3) filed/entered October 26, 2018, on October 26, 2018.

<SIGNED ON THE FOLLOWING PAGE>

¹ SavaSeniorCare Consulting, LLC, is misidentified in this action as “SavaSeniorCare Consulting Services, LLC.”

Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: 

Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
Perry M. Buckner, IV (SC Bar No. 100031)
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Attorneys for Appellants

Charleston, South Carolina

Dated: 11/21/18

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SavaSeniorCare Consulting Services, LLC,

Defendants,

Of whom SSC Seneca Operating Company, LLC,
d/b/a Seneca Health & Rehabilitation Center;
SavaSeniorCare Administrative Services, LLC; and
SavaSeniorCare Consulting Services, LLC,

Appellants.

PROOF OF SERVICE

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
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843-720-5488

Attorneys for Appellants


I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellants, SSC Seneca Operating Company, LLC, d/b/a Seneca Health & Rehabilitation Center; SavaSeniorCare Administrative Services, LLC; and SavaSeniorCare Consulting, LLC (misidentified as "SavaSeniorCare Consulting Services, LLC"), hereby certify that the foregoing **NOTICE OF APPEAL** was served on all other parties to this matter by depositing a copy of the same in the U.S. Mail on November 21, 2018, properly posted for delivery to the following addressees:

Raymond T. Wooten, Esquire
Smith, Jordan & Lavery, P.A.
1810 East Main Street
Easley, SC 29640

Attorneys for Respondent Betty Herrington

I further certify that a copy of this **NOTICE OF APPEAL** is this day, November 21, 2018, being electronically filed with the lower court.

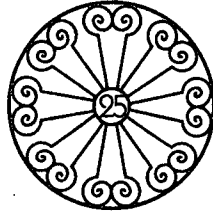
Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: 

Russell G. Hines (SC Bar No. 72100)
Attorneys for Appellants

Charleston, South Carolina

Dated: 11/21/18



YCR LAW

Russell G. Hines
Partner

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Direct Fax: (843) 579-1327
E-mail: RHines@ycrlaw.com

November 21, 2018

VIA U.S. MAIL & FACSIMILE

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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NOV 26 2018
SC Court of Appeals

Re: Betty Herrington v. SSC Seneca Operating Company, LLC, et al.
Case No.: 2018-CP-37-00271
Claim No.: 17-PL-000169408
YCR File: 14653-20170810

Dear Ms. Kitchings:

Enclosed for filing with regard to the above-referenced matter please find the following:

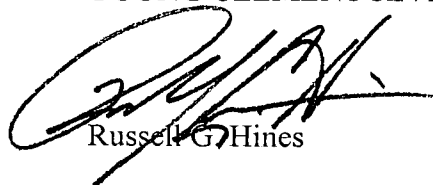
- The original and two (2) copies of a **Notice of Appeal**, with the orders referenced in and attached to the Notice of Appeal inserted as exhibits;
- The original and two (2) copies of a **Proof of Service** regarding the same;
- Our firm's check in the amount of \$250.00 for the required filing fee.

Kindly return to us a court-stamped copy of each filed document in the envelope provided.

By copy of this correspondence, I am serving the Notice of Appeal upon Respondent's counsel. I am also e-filing the Notice of Appeal in the lower court. Of course, if the Court has any questions or concerns, or needs anything further from me, please just let me know. With best wishes and kindest regards, I am

Sincerely,

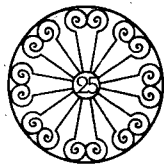
YOUNG CLEMENT RIVERS, LLP



Russell G. Hines

RGH/amj
Enclosures

cc: Raymond T. Wooten, Esquire, Smith, Jordan & Lavery, P.A. (via U.S. Mail & email)
The Honorable Beverly H. Whitfield, Oconee County Clerk of Court (via e-filing)



YCR LAW
Young Clement Rivers, LLP

25 CALHOUN STREET, SUITE 400
P.O. Box 993
CHARLESTON, SC 29402

AMJ

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