

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

RECEIVED

Appeal from Oconee County  
Court of Common Pleas

NOV 21 2018

R. Scott Sprouse, Circuit Court Judge

SC Court of Appeals

Case No. 2018-CP-37-00271

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, LLC<sup>1</sup> (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>**

---

<sup>1</sup> 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)

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*

Charleston, South Carolina

Dated: 11/21/18

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

**RECEIVED**

Appeal from Oconee County  
Court of Common Pleas

NOV 21 2018

R. Scott Sprouse, Circuit Court Judge

SC Court of Appeals

Case No. 2018-CP-37-00271

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.

**PROOF OF SERVICE**

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*

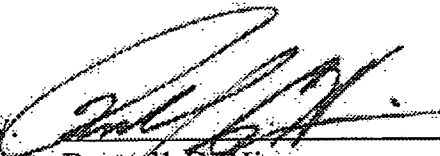
I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellants, SSC Seneca Operating Company, LLC, d/b/a Seneca Health & Rehabilitation Center; SavaSeniorCare Administrative Services, LLC; and SavaSeniorCare Consulting, LLC (misidentified as "SavaSeniorCare Consulting Services, LLC"), hereby 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*

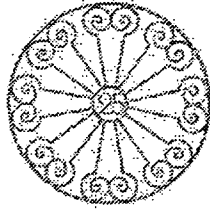
I further certify that a copy of this **NOTICE OF APPEAL** is this day, November 21, 2018, being electronically filed with the lower court.

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

Direct Dial: (843) 720-5488  
Direct Fax: (843) 579-1327  
E-mail: RHines@ycrlaw.com

November 21, 2018

## RECEIVED

NOV 21 2018

SC Court of Appeals

**VIA U.S. MAIL & FACSIMILE**

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

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:

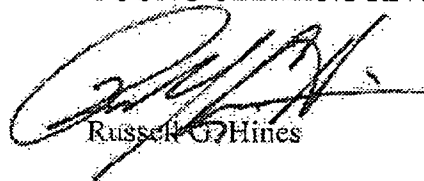
- The original and two (2) copies of a **Notice of Appeal**, with the orders referenced in and attached to the Notice of Appeal inserted as exhibits;
- The original and two (2) copies of a **Proof of Service** regarding the same;
- Our firm's check in the amount of \$250.00 for the required filing fee.

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)

25 CALROUN STREET, SUITE 400, P.O. BOX 993, CHARLESTON, SC 29402 • (843) 577-4000 • [www.ycrlaw.com](http://www.ycrlaw.com)

Charleston • Columbia