

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
Appellate Case No.: 2018-002088

RECEIVED
APR 24 2019
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 which SSC Seneca Operating Company, LLC, d/b/a Seneca Health & Rehabilitation Center; SavaSeniorCare Administrative Services, LLC; SavaSeniorCare Consulting Services, LLC

Appellants.

DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

Respondent proposes the following to be included in the Record on Appeal:

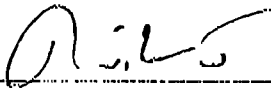
1. Summons and Complaint
2. Defendant SavaSeniorCare, LLC's Motion to Dismiss for Lack of Personal Jurisdiction

3. Defendant SSC Equity Holdings, LLC's Motion to Dismiss for Lack of Personal Jurisdiction
4. Consent Order to Stay as to SavaSeniorCare, LLC and SSC Equity Holdings, LLC
5. Defendant SSC Seneca Operating Company, LLC's Motion Compel Arbitration
6. Defendant SavaSeniorCare Administrative Services, LLC's Motion Compel Arbitration
7. Defendant SavaSeniorCare Consulting Services, LLC's Motion to Compel Arbitration
8. Memorandum in Opposition to Motions to Compel Arbitration by Defendants SSC Seneca Operating Company, LLC, D/B/A Seneca Health and Rehab; SavaSeniorCare Administrative Services, LLC; and SavaSeniorCare Consulting, LLC
9. Defendant SSC Seneca Operating Company, LLC, D/B/A Seneca Health and Rehab's Memorandum in Support of its Motion to Compel Arbitration and Stay Court Proceedings
10. Defendant SavaSeniorCare Administrative Services, LLC's Memorandum in Support of its Motion to Compel Arbitration and Stay Court Proceedings
11. Defendant SavaSeniorCare Consulting, LLC's Memorandum in Support of its Motion to Compel Arbitration and Stay Court Proceedings
12. Transcript of Record from September 10, 2018 Motion to Compel Arbitration
13. Supplemental Memorandum in Opposition to Motions to Compel Arbitration by Defendants SSC Seneca Operating Company, LLC, D/B/A Seneca Health and Rehab; SavaSeniorCare Administrative Services, LLC; and SavaSeniorCare Consulting, LLC
14. Dispute Resolution Program
15. Order Denying Motion to Compel Arbitration
16. Defendant SSC Seneca Operating Company, LLC d/b/a Seneca Health and Rehabilitation Center's Notice of Motion and Motion to Reconsider Alter and/or Amend Pursuant to S.C.R.P. Rule 59(c)
17. Defendant SavaSeniorCare Administrative Services, LLC's Notice of Motion and

Motion to Reconsider Alter and/or Amend Pursuant to S.C.R.P. Rule 59(e)

18. Defendant SavaSeniorCare Consulting Services, LLC's Notice of Motion and Motion to Reconsider Alter and/or Amend Pursuant to S.C.R.P. Rule 59(e)
19. Order Denying Defendant SavaSeniorCare Administrative Services, LLC's Motion for Reconsideration
20. Order Denying Defendant SavaSeniorCare Consulting Services, LLC's Motion for Reconsideration
21. Order Denying SSC Seneca Operating Company, LLC d/b/a Seneca Health and Rehabilitation Center's Motion for Reconsideration
22. Notice of Appeal

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



Raymond T. Wooten (S.C. Bar No. 81483)

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Attorney for Appellant

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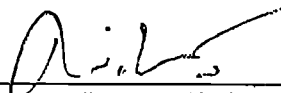
Defendants,

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Appellants.

CERTIFICATE OF COUNSEL

In accordance with Rule 210(c), SCACR, the undersigned certifies that the Designation of Matter to be included in the Record on Appeal contains no matter which is irrelevant to the Appeal.



Raymond T. Wooten (S.C. Bar No. 81483)

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Attorney for Appellant

Easley, South Carolina
April 23, 2019

THE STATE OF SOUTH CAROLINA
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Of which SSC Seneca Operating Company, LLC, d/b/a Seneca Health & Rehabilitation Center; SavaSeniorCare, LLC; SavaSeniorCare Administrative Services, LLC; SavaSeniorCare Consulting Services, LLC

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PROOF OF SERVICE

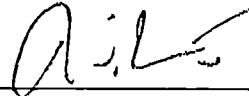
I certify that I have served the INITIAL BRIEF OF RESPONDENT, DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL, AND CERTIFICATE OF COUNSEL on the Appellants by depositing a copy of it in the United States mail, postage prepaid, on April 24, 2019, addressed to the counsels of record

and unrepresented parties at the following addresses:

Other Counsel of Record:

YOUNG CLEMENT RIVERS, LLP
P.O. Box 993
Charleston, SC 29402
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D. Jay Davis, Jr., Esq.
Perry M. Buckner, IV, Esq.
Russell G. Hines, Esq.

Attorneys for Appellants



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Easley, South Carolina
April 24, 2019

Smith Jordan
- Attorneys at Law -^{PA}

Ronnie L. Smith †
W. Grady Jordan
James E. Sterling
† Of Counsel

Raymond T. Wooten*
Thomas S. Phillips
*Licensed in SC & GA

April 24, 2019

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VIA FIRST CLASS MAIL AND FACSIMILE TO (803)734-1839

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

RE: Betty Herrington vs. SSC Seneca Operating Company, LLC, et al.
Case No.: 2018-CP-37-00271
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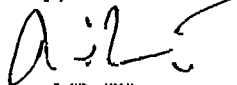
Dear Ms. Kitchings:

Please find enclosed herewith the original and one (1) copy of Respondent's Initial Brief and Designation of Matter to be Included in the Record of Appeal along with a Proof of Service and Certificate of Counsel in connection with the above referenced matter.

Also enclosed herewith is the original and one (1) copy of the Certificate of Service of such Initial Brief, Designation of Matter to be Included in the Record on Appeal and Certificate of Counsel.

Please contact me if you have any questions.

Sincerely,


Raymond T. Wooten

cc: Client
Stephen I. Brown, Esq.
D. Jay Davis, Jr., Esq.
Perry M. Buckner, IV, Esq.
Russell G. Hines, Esq.