

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

Roger M. Young, Sr., Circuit Court Judge  
Kristi Lea Harrington, Circuit Court Judge

Appellate Case No. 2019-000028

Teresa Murphy, as Personal Representative ..... Respondent  
for the Estate of Isaac Strong,

v.

Hunt Valley Holdings, LLC f/k/a  
Fundamental Long Term Care Holdings,  
LLC, Fundamental Clinical and Operational  
Services, LLC, Fundamental Consulting,  
LLC, Fundamental Administrative Services,  
LLC, THI of Baltimore, Inc., THI of South  
Carolina, LLC, THI of South Carolina at  
Rock Hill, LLC d/b/a Magnolia Manor of  
Rock Hill, and Amisub of S.C., Inc. d/b/a  
Piedmont Medical Center

..... Defendants.

Of which Fundamental Clinical and  
Operational Services, LLC, Fundamental  
Administrative Services, LLC, THI of South  
Carolina, LLC, THI of South Carolina at  
Rock Hill, LLC d/b/a Magnolia Manor of  
Rock Hill

..... Appellants

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SFP 30 2019

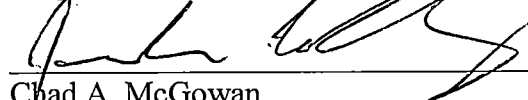
SC Court of Appeals

**MOTION FOR LEAVE TO FILE AMENDED DESIGNATION  
OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rule 240 of the South Carolina Rules of Appellate Procedure, Respondent  
Teresa Murphy moves for leave to file an amended Designation of Matter to be Included in the

Record on Appeal originally filed in connection with Respondent's Initial brief. A \$50.00 motion fee check is enclosed.

Respectfully submitted,



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Eve S. Goodstein  
Jordan C. Calloway  
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Attorneys for Respondent

Rock Hill, South Carolina

September 27, 2019

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

Roger M. Young, Sr. Circuit Court Judge  
Kristi Lea Harrington, Circuit Court Judge

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SC Court of Appeals

Teresa Murphy, as Personal Representative ..... Respondent  
for the Estate of Issac Strong

v.

Hunt Valley Holdings, LLC f/k/a  
Fundamental Long Term Holdings,  
LLC, Fundamental Clinical and Operational  
Services, LLC, Fundamental Consulting, LLC,  
Fundamental Administrative Services, LLC,  
THI of Baltimore, Inc., THI of South Carolina,  
LLC, THI of South Carolina at Rock Hill, LLC  
d/b/a Magnolia Manor of Rock Hill, and Amisub  
of S.C., Inc. d/b/a Piedmont Medical Center ..... Defendants.

Of which Fundamental Clinical and Operational  
Services, LLC, Fundamental Administrative  
Services, LLC, THI of South Carolina LLC,  
THI of South Carolina at Rock Hill, LLC d/b/a  
Magnolia Manor of Rock Hill ..... Appellants

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**CERTIFICATE OF SERVICE**

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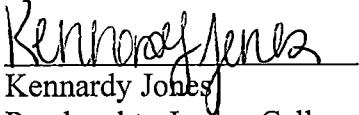
The undersigned hereby certifies that on this 27<sup>th</sup> day of September, 2019, she served  
counsel for the Defendants with a copy of the Respondent's Motion for Leave to File Amended

Designation of Matter to Be Included in the Record on Appeal in this matter by mailing a copy of the same by United States Mail with first class postage prepaid to the following addresses:

Russell G. Hines, Esquire  
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101 West St. John Street, Suite 100  
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Honorable Jenny Abbott Kitchings  
SC Court of Appeals Clerk of Court  
1220 Senate Street  
Columbia, SC 29201

  
Kennardy Jones  
Paralegal to Jordan Calloway

# McGowan, Hood & Felder, LLC

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\*Of Counsel

September 27, 2019

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

Re: Teresa Murphy as Personal Representative of the Estate of Issac Strong  
vs. Hunt Valley Holdings, LLC f/k/a Fundamental Long Term Care Holding, LLC  
et al.  
Appellate Case No.: 2019-000028

Dear Judge Kitchings:

Please find enclosed one (1) original and six (6) copies of the Respondent's Motion for Leave to File Amended Designation of Matter To Be Included In The Records On Appeal for filing in the above-referenced matter. Return the filed copies in the enclosed envelope.

If you have any questions, feel free to contact our office.

Sincerely,

A handwritten signature in cursive script that reads "Jordan Calloway".

Jordan Calloway

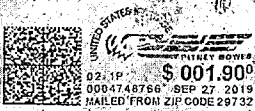
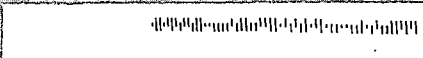
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SC Court of Appeals

JCC/ksj

cc: Russell G. Hines, Esq.  
William B. Darwin, Jr., Esq.  
A. Walker Barnes, Esq.



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