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

Appeal from Spartanburg County
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

Case No. 2018-CP-42-04405

RECEIVED
OCT 14 2019
SC Court of Appeals

The Estate of Mary Solesbee, by her personal
representative, Connie Bayne,

Respondent,

v.

Fundamental Clinical and Operational Services, LLC;
Fundamental Administrative Services, LLC; THI of
South Carolina at Magnolia Manor-Inman, LLC d/b/a
Magnolia Manor-Inman; Inpatient Consultants of North
Carolina, P.C.; and Angela Brown, ACNP,

Defendants,

Of whom Fundamental Clinical and Operational
Services, LLC; Fundamental Administrative Services,
LLC; and THI of South Carolina at Magnolia Manor-
Inman, LLC d/b/a Magnolia Manor-Inman are

Appellants.

NOTICE OF APPEAL

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
Russell G. Hines (SC Bar No. 72100)
Gaillard T. Dotterer, III (SC Bar No. 103620)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29402
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Appellants

Defendants, Fundamental Clinical and Operational Services, LLC; Fundamental Administrative Services, LLC; and THI of South Carolina at Magnolia Manor-Inman, LLC d/b/a Magnolia Manor-Inman (collectively, "Appellants"), hereby appeal the following order of the Honorable Grace Gilchrist Knie, Circuit Court Judge:

- **Order filed September 11, 2019** (denying Appellants' motions to compel arbitration and stay, a copy of which is attached hereto and incorporated herein by reference).

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: 

Stephen L. Brown (SC Bar No. 66468)

D. Jay Davis, Jr. (SC Bar No. 12084)

Russell G. Hines (SC Bar No. 72100)

Gaillard T. Dotterer, III (SC Bar No. 103620)

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(843) 720-5488

Attorneys for Appellants

Charleston, South Carolina

Dated: 10/11/19

Other Counsel of Record:

W. Harold Christian, Jr.

Matthew W. Christian

CHRISTIAN & DAVIS, LLC

1007 E. Washington Street

Greenville, South Carolina 29601

P.O. Box 332 (29602)

(864) 232-7363

Attorneys for Respondent

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Inman, LLC d/b/a Magnolia Manor-Inman are

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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Gaillard T. Dotterer, III (SC Bar No. 103620)
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Charleston, South Carolina 29402
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(843) 720-5488

Attorneys for Appellants

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellants, 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 October 11, 2019, properly posted for delivery to the following addressees:

W. Harold Christian, Jr., Esquire
Matthew W. Christian, Esquire
Christian & Davis, LLC
P.O. Box 332
Greenville, SC 29602

Attorneys for Respondent

I further certify that a copy of this **NOTICE OF APPEAL** is this day, October 11, 2019, being E-Filed with the lower court (which will also, i.e., in addition to service by mail, effect service of this notice electronically on counsel of record for all parties to this matter).

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By:

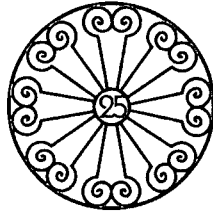


Russell G. Hines (SC Bar No. 72100)

Attorneys for Appellants

Charleston, South Carolina

Dated: 10/11/19



YCR LAW

Kathleen B. Barnes
Secretary

Direct Dial: (843) 720-5488
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October 11, 2019

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

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OCT 14 2019
SC Court of Appeals

Re: The Estate of Mary Solesbee, by her Personal Representative Connie Bayne v. Fundamental Clinical and Operational Services, LLC; Fundamental Administrative Services, LLC; and THI of South Carolina at Magnolia Manor-Inman; d/b/a Magnolia Manor-Inman; IPC HealthCare, Inc; and Angela Brown, ACNP
Case No.: 2018-CP-42-04405
Claim No.: HBLM# 1825909
YCR File: 14347-20180793

Dear Ms. Kitchings:

Enclosed please find the original and one (1) copy of a Notice of Appeal, the original and one (1) copy of the Proof of Service of same and our firm's check in the amount of \$250.00 representing the filing fee. Please file the originals and return court-stamped copies to me in the enclosed envelope.

With best wishes and kindest regards, I am

Sincerely,

YCR LAW, LLP

Kathleen B. Barnes
Secretary

Enclosures

(via US Mail and email)

Cc: W. Harold Christian, Jr., Esquire, Christian & Davis, LLC
Matthew W. Christian, Esquire, Christian & Davis, LLC

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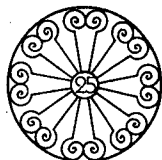
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