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

Appeal from Greenville County  
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

Case No. 2019-CP-23-00473

**RECEIVED**  
NOV 25 2019  
SC Court of Appeals

The Estate of Patricia Royston, by and through  
the appointed personal representative, Marianne McCoig,  
individually and on behalf of the statutory beneficiaries,

Respondent,

v.

Hunt Valley Holdings, LLC,  
a/k/a Fundamental Long Term Care Holdings, LLC;  
Fundamental Clinical and Operational Services, LLC;  
Fundamental Administrative Services, LLC; and  
THI of South Carolina at Magnolia Place at Greenville, LLC,  
d/b/a Magnolia Place-Greenville,

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)  
Kate C. Mettler (SC Bar No. 103762)  
25 Calhoun Street, Suite 400  
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P.O. Box 993 (29402)  
(843) 720-5488

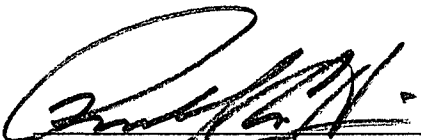
*Attorneys for Appellants*

Defendants, Hunt Valley Holdings, LLC, a/k/a Fundamental Long Term Care Holdings, LLC (“HVH”), Fundamental Clinical and Operational Services, LLC (“FCOS”), Fundamental Administrative Services, LLC (“FAS”), and THI of South Carolina at Magnolia Place at Greenville, LLC, d/b/a Magnolia Place-Greenville (the “Facility”) (collectively, “Appellants”), hereby appeal the following orders of the Honorable Robin B. Stilwell, Circuit Court Judge, copies of which are attached hereto:

- **Order filed October 9, 2019** (denying the Facility’s motion to compel arbitration; HVH, FCOS, and FAS’s respective motions to stay this action pending the outcome of the arbitrability dispute/arbitration proceedings; and all Appellants’ respective motions to be protected from discovery pending the resolution of the Facility’s motion to compel arbitration); and
- **Order filed October 23, 2019** (denying Appellants’ motion to alter, amend, and/or reconsider).

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: 

Stephen E. BROWN (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
Russell G. Hines (SC Bar No. 72100)  
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*Attorneys for Appellants*

Charleston, South Carolina

Dated: 11/20/19

**\*Other Counsel of Record Identified on Following Page\***

Other Counsel of Record:

Gary W. Poliakoff (SC Bar No. 4488)  
Raymond P. Mullman, Jr. (SC Bar No. 8662)  
POLIAKOFF & ASSOCIATES, P.A.  
215 Magnolia Street  
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*and*

Matthew W. Christian (SC Bar No. 70516)  
CHRISTIAN & DAVIS, LLC  
1007 E. Washington Street  
Greenville, South Carolina 29601  
P.O. Box 332 (29602)  
(864) 232-7363

*Attorneys for Respondent*

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

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Appeal from Greenville County  
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

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Fundamental Administrative Services, LLC; and  
THI of South Carolina at Magnolia Place at Greenville, LLC,  
d/b/a Magnolia Place-Greenville,

Appellants,

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**PROOF OF SERVICE**

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YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
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*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 November 20, 2019, properly posted for delivery to the following addressees:

Gary W. Poliakoff, Esquire  
Raymond P. Mullman, Jr., Esquire  
Poliakoff & Associates, P.A.  
P.O. Box 1571  
Spartanburg, South Carolina 29304  
*Attorneys for Respondent*

Matthew W. Christian, Esquire  
Christian & Davis, LLC  
P.O. Box 332  
Greenville, South Carolina 29602  
*Attorneys for Respondent*

I further certify that a copy of this **NOTICE OF APPEAL** is this day, November 20, 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:

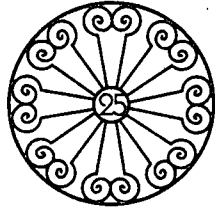


Russell G. Hines (SC Bar No. 72100)

*Attorneys for Appellants*

Charleston, South Carolina

Dated: 11/20/19



# YCR LAW

Kathleen B. Barnes  
Secretary

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E-mail: kbarnes@ycrlaw.com

November 20, 2019

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

Re: The Estate of Patricia Royston, by and through the appointed Personal Representative Marianne McCoig, and on behalf of the statutory beneficiaries v. Hunt Valley Holdings, LLC, et al  
Case No.: 2019-CP-23-00473  
Claim No.: HBLM# 1725803  
YCR File: 14347-20180896

**RECEIVED**

NOV 25 2019

SC Court of Appeals

Dear Ms. Kitchings:

Enclosed please find the original and one (1) copy of a Notice of Appeal and the original and one (1) copy of the Proof of Service of same. Also enclosed is our firm's check in the amount of \$250.00 to cover 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

Enclosure

(all via US Mail and email)

Cc: Gary W. Poliakoff, Esquire, Poliakoff & Associates, P.A.  
Raymond P. Mullman, Jr., Esquire, Poliakoff & Associates, P.A.  
Matthew W. Christian, Esquire, Christian & Davis, LLC

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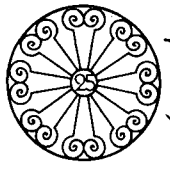
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