

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

Appeal from Charleston County
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

Appellate Case No. 2019-001413
Circuit Court Case No. 2018-CP-10-01251

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DEC 02 2019
SC Court of Appeals

Richard Ladson, Jr.,
by and through Richard Miles Ladson, Sr., POA,

Respondent,

v.

THI of South Carolina at Charleston, LLC
d/b/a Riverside Health and Rehab,

Appellant.

**APPELLANT'S DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON 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)
25 Calhoun Street, Suite 400
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Attorneys for Appellant

Appellant, THI of South Carolina at Charleston, LLC d/b/a Riverside Health and Rehab, proposes the following to be included in the Record on Appeal (including all attachments/exhibits thereto, but omitting any duplicative material):

Orders

1. Order [Denying Defendant’s Motion to Compel Arbitration], filed February 6, 2019;
2. Order [Denying Defendant’s Motion to Reconsider], filed July 26, 2019;

Pleadings

3. Summons and Complaint, filed March 8, 2018;
4. Defendant’s Answer to Plaintiff’s Complaint, filed June 22, 2018;

Transcripts

5. Transcript of Hearing on Defendant’s Motion to Compel Arbitration, held November 27, 2018;

Other materials or documents

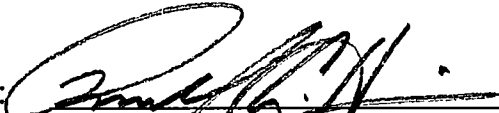
6. Defendant’s Motion to Compel Arbitration and Petition to Stay State Court Proceedings, filed August 21, 2018;
7. Defendant’s Memorandum in Support of Motion to Dismiss and Compel Arbitration, filed November 21, 2018;
8. Plaintiff’s Memorandum in Opposition to Defendant’s Motion to Compel Arbitration and Petition to Stay State Court Proceedings, filed November 21, 2018;
9. Defendant’s Motion to Reconsider, Alter, and/or Amend Pursuant to Rule 59(e), SCRCF, filed February 8, 2019; and
10. Notice of Appeal/Proof of Service, served August 20, 2019, filed (in

the circuit court) August 22, 2019.

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

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: 

Stephen L. Brown (SC Bar No. 66468)

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

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Attorneys for Appellant

Charleston, South Carolina

Dated: 11/25/19

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PROOF OF SERVICE

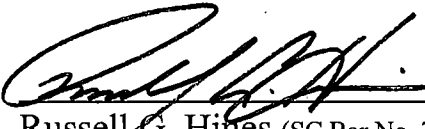
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Attorneys for Appellant

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellant, hereby certify that the foregoing **APPELLANT'S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on November 25, 2019, properly posted for delivery to the following addressees:

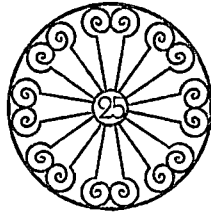
Carl E. Pierce, II, Esquire
Benjamin C. Smoot, II, Esquire
PIERCE, HERNS, SLOAN & WILSON, LLC
321 East Bay Street
Charleston, South Carolina 29401
Attorneys for Respondent

Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: 
Russell G. Hines (SC Bar No. 72100)
Attorneys for Appellant

Charleston, South Carolina

Dated: 11/25/19



YCR LAW

Russell G. Hines
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November 25, 2019

VIA U.S. MAIL

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

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SC Court of Appeals

Re: Richard Ladson v. THI of South Carolina at Charleston
Appellate Case No.: 2019-001413
Circuit Court Case No.: 2018-CP-10-1251
Claim No.: 1725747
YCR File: 14347-20170914

Dear Ms. Kitchings:

Enclosed for filing please find the original and one (1) copy of the **Initial Brief of Appellant and Appellant's Designation of Matter to be Included in the Record on Appeal**, as well as a **Proof of Service** for each. Please return a court-stamped copy of each document to me in the envelope provided. As always, if you have any questions, please do not hesitate to contact me.

With best wishes and kindest regards, I am

Sincerely,

YCR LAW, LLP



Russell G. Hines

Enclosures

(via U.S. Mail)

cc: Carl E. Pierce, II, Esquire, Pierce, Hems, Sloan & Wilson, LLC
Benjamin C. Smoot, II, Esquire, Pierce, Hems, Sloan & Wilson, LLC

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