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

Appeal from Richland County
Court of Common Pleas

L. Casey Manning, Circuit Court Judge

RECEIVED

MAR 18 2020

SC Court of Appeals

Case No. 2019-CP-40-02295

Vermell Daniels
as Personal Representative of the Estate of Annie Porter,

Respondent,

v.

THI of South Carolina at Columbia, LLC
d/b/a Midlands Health & Rehabilitation Center,

Appellant.

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

Other Counsel of Record:

D. Nathan Hughey (SC Bar No. 68409)

A. Stuart Hudson (SC Bar No. 71691)

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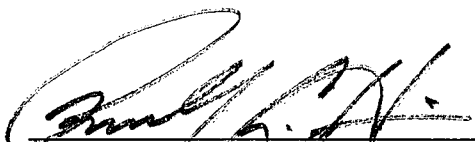
Attorneys for Respondent

Defendant, THI of South Carolina at Columbia, LLC d/b/a Midlands Health & Rehabilitation Center (“Appellant”), hereby appeals the following orders of the Honorable L. Casey Manning, Circuit Court Judge:

- **Order Denying Defendant’s Motion to Dismiss Plaintiff’s Complaint, Compel Arbitration and Stay State Court Proceedings**, filed November 6, 2019, and
- **Order Denying Defendant’s Motion to Alter, Amend, and/or Reconsider Order Denying Motion to Compel Arbitration**, filed February 24, 2020.

Copies of the appealed orders are attached hereto and incorporated herein by reference. Appellant received written notice of entry of the most recent order on February 24, 2020.

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)
Kate C. Mettler (SC Bar No. 103762)
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Attorneys for Appellant

Charleston, South Carolina

Dated: 3/19/20

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Vermell Daniels
as Personal Representative of the Estate of Annie Porter,

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v.

THI of South Carolina at Columbia, LLC
d/b/a Midlands Health & Rehabilitation Center,

Appellant.

PROOF OF SERVICE

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
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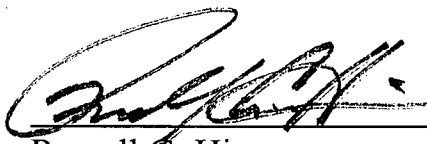
Attorneys for Appellant

I, Russell G. Hines, of Young Clement Rivers, LLP, attorneys for Appellant, hereby certify that the foregoing **NOTICE OF APPEAL** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on March 16, 2020, properly posted for delivery to the following addressees:

D. Nathan Hughey, Esquire
A. Stuart Hudson, Esquire
Bradley H. Banyas, Esquire
Hughey Law Firm, LLC
1311 Chuck Dawley Boulevard, Suite 201
Mt. Pleasant, SC 29464
Attorneys for Respondent

I also certify that a copy of this **NOTICE OF APPEAL** is this day, March 16, 2020, being E-Filed with the lower court (which will also, i.e., in addition to service by mail, effect service of the notice electronically on all counsel of record).

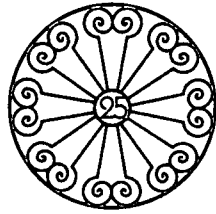
Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: 

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

Charleston, South Carolina

Dated: 3/16/20



YCR LAW

Aimee M. Justman
Legal Assistant

Direct Dial: (843) 720-5460
Direct Fax: (843) 579-1385
E-mail: Ajustman@ycrlaw.com

March 16, 2020

VIA US MAIL ONLY

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: Vermell Daniels as Personal Representative of the Estate of Annie Porter v. THI of South Carolina at Columbia, LLC d/b/a Midlands Health & Rehabilitation Center and Matt Stanley
Case No.: 2019-CP-40-02295
Claim No.: HBLM #: 1827269
YCR File: 14347-20181034

Dear Ms. Kitchings:

Enclosed herewith for filing in the above-referenced matter please find the following:

- The original and two (2) copies of a Notice of Appeal;
- The original and two (2) copies of a Proof of Service regarding the same;
- Three (3) copies each of the orders referenced in/attached to the Notice of Appeal; and
- Our firm's check in the amount of \$250.00 for the required filing fee.

Please file these documents and return a file-stamped copy of each to us in the envelope provided.

By copy of this correspondence, I am serving the Notice of Appeal upon the Respondent (as well as all other parties to this action), and I am also e-filing the Notice of Appeal in the lower court. Of course, if the Court has any questions or concerns, or needs anything further from me, please just let me know. With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Aimee M. Justman
Legal Assistant

/amj

Enclosures

cc (w/enc., via email & U.S. Mail): D. Nathan Hughey Esquire, Hughey Law Firm, LLC
A. Stuart Hudson, Esquire, Hughey Law Firm, LLC
Bradley H. Banyas, Esquire, Hughey Law Firm, LLC

cc (w/enc., via e-filing): Jeanette W. McBride, Richland County Clerk of Court

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03/16/2020
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14347
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