

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

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Appellate Case No. 2019-001731

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**RECEIVED**

APR 27 2020

SC Court of Appeals

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

v.

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

Of which Fundamental Clinical and  
Operational Services, LLC, Fundamental  
Administrative Services, LLC, THI of  
South Carolina at Magnolia Manor-Inman  
d/b/a Magnolia Manor-Inman are the ..... Appellants.

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**RESPONDENT'S DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

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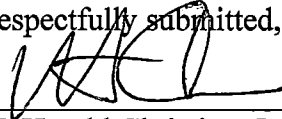
Pursuant to Rule 209, SCACR, and in addition to those materials identified in Appellants' designations, Respondent designates the following documents to be included in the Record on Appeal:

1. Second Amended Complaint (filed Feb. 27, 2019); and

2. Exhibits B, C, and D to Plaintiff's Memorandum of Law in Opposition to Defendant's Motion to Dismiss and to Compel Arbitration (dated Aug. 12, 2019).

Pursuant to Rule 209(c), SCACR, counsel for Respondent certifies that this Designation contains no matter which is irrelevant to the appeal.

Respectfully submitted,



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Attorneys for Respondent

April 24, 2020  
Greenville, SC

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..... Appellants.

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**PROOF OF SERVICE**

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I, W. Harold Christian, Jr., counsel for Respondent, hereby certify that the **Initial Brief of Respondent** and the **Designation of Matters to be Included in the Record on Appeal** were served on all other parties to this matter by depositing a copy of the same in the U.S. Mail on April 24, 2020, properly posted for delivery to the following :

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (sc Bar No. 66462)  
D. Jay Davis, Jr. (SCBa1-No. 12084)  
Russell G. Hines (sc Bar No. 72100)  
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Respectfully submitted,



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Greenville, SC  
April 24, 2020



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April 24, 2020

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SC Court of Appeals

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

**RE: The Estate of Mary Solesbee, by her Personal Representative Connie Bayne v.  
Fundamental Clinical and Operational Services, LLC, et al  
Appellate Case No.: 2019-001731**

Dear Ms. Kitchings:

Enclosed please find the original and one (1) copy of the Initial Brief of Respondent, the Designation of Matter to be Included on Appeal, and the original and one (1) copy of the Proof of Service of same.

Please file the originals and return the file stamped copies to me in the enclosed envelope.

With kindest regards, I am

Very truly yours,

CHRISTIAN & CHRISTIAN, LLC

---

W. Harold Christian, Jr.  
Attorney at Law

WHC/eh  
Enclosure(s)

Cc: Russell G. Hines





**Christian & Christian, LLC**  
ATTORNEYS AT LAW  
Post Office Box 332  
Greenville, SC 29602

To

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

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IMPORTANT DOCUMENTS

