

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Robin B. Stillwell, Circuit Court Judge

Appellate Case No. 2019-001955

RECEIVED

Jun 30 2020

SC Court of Appeals

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

v.

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

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

Pursuant to Rule 209, SCACR, and in addition to the items designated by Appellants,

Respondent designates the following items to be included in the Record on Appeal:

1. Notice of Intent to File Suit;
2. Plaintiff’s Memorandum of Law in Opposition to Facility’s Motion to Compel Arbitration including Exhibits 1 and 2;
3. Plaintiff’s Motion to Compel to Appellant HVH (dated May 19, 2019) and Exhibits 1-2; and
4. Plaintiff’s Motion to Compel to Facility, dated June 19, 2019;

Pursuant to Rule 209(c), SCACR, Respondent's counsel certifies that no matter identified here is irrelevant to the appeal.

Respectfully submitted,

/s/ Jordan C. Calloway
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Attorneys for Respondent

June 30, 2020
Rock Hill, SC

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Magnolia Place at Greenville, LLC d/b/a
Magnolia Place-Greenville, Appellants.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 30, 2020, he served Appellants' counsel with Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal at the e-mail addresses listed below pursuant to Section (g)(3) of the South Carolina Supreme Court's March 20, 2020 order (Order No. 2020-03-20-01):

sbrown@ycrlaw.com
jdavis@ycrlaw.com
rhines@ycrlaw.com
kmettler@ycrlaw.com

/s/ Jordan C. Calloway
Attorney for Respondent

Estate of Patricia Royston v. Hunt Valley Holdings, LLC et al. (Appellate Case No. 2019-001955)

Jordan Calloway <jordan@mcgowanhood.com>

Tue 6/30/2020 1:24 PM

To: Davis, Jay (jdavis@ycrlaw.com) <jdavis@ycrlaw.com>; Hines, Russell <RHines@ycrlaw.com>; kmettler@ycrlaw.com <kmettler@ycrlaw.com>; sbrown@ycrlaw.com <sbrown@ycrlaw.com>**Cc:** Ray Mullman <rmullmanjr@gmail.com>; Boss Poliakoff <atty@gpoliakoff.com>; Matt Christian <mchristian@cclawfirm.com> 2 attachments (381 KB)

P. Royston--Designation of Matter (Respondent's Br.) PDF.pdf; P. Royston--Initial Brief of Respondent PDF 2.pdf;

Counsel:

I am attaching the Initial Brief of Respondent and Respondent's Designation of Matter to be Included in the Record on Appeal that are being electronically filed today with the Court of Appeals. Pursuant to Section (g)(3) of the South Carolina Supreme Court's March 20, 2020, order (Order No. 2020-03-20-01), please consider this email as service for both documents.

Thanks,

Jordan Calloway
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