

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

Appeal from Spartanburg County
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

Case No. 2019-CP-42-03236

Appellate Case no. 2020-000357

RECEIVED
JUL 30 2020
SC Court of Appeals

Rita St. Aubin,
as Personal Representative of the Estate of Irene Ramsey,

Respondent,

v.

THI of South Carolina at Camp Care, LLC, d/b/a Lake Emory
Post Acute Care; THI of South Carolina, LLC; Hunt Valley
Holdings, LLC; THI of Baltimore, Inc.; and Casey Caddell, as
Officer/Manager of THI of South Carolina at Camp Care, LLC,
d/b/a Lake Emory Post Acute Care,

Appellants.

**APPELLANTS' 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)
Matthew O. Riddle (SC Bar No. 76650)
Russell G. Hines (SC Bar No. 72100)
Gaillard T. Dotterer, III (SC Bar No. 103620)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Appellants

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

Appellants propose the following to be included in the Record on Appeal:

Orders, Judgments, Decrees, or Decisions

1. Order Regarding Defendants' Motion to Compel Arbitration and Stay Action, filed January 9, 2020;
2. Order Regarding Defendants' Motion to Alter, Amend, and/or Reconsider the Court's Order Denying Defendants' Motion to Compel Arbitration and Stay, filed February 14, 2020;

Pleadings

3. Summons and Complaint, filed September 10, 2019;

Transcripts

4. Hearing Transcript from December 18, 2019;

Other materials or documents

5. Facility's Motion to Stay Action and Compel Arbitration, filed October 28, 2019;
6. Caddell's Motion to Stay Action and Compel Arbitration, filed December 9, 2019;
7. Facility's Memorandum in Support of Motion to Stay Action and Compel Arbitration, filed December 13, 2019;
 - a. Exhibit A, Arbitration Agreement;
 - b. Exhibit B, Power of Attorney;
8. HVH's Motion to Stay, filed October 28, 2019;
9. THIB's Motion to Stay, filed October 28, 2019;
10. THISC's Motion to Stay, filed October 28, 2019;

11. Email, dated December 31, 2019, from Plaintiff's Counsel to Circuit Court with Plaintiff's Proposed Order;
 - a. Plaintiff's Proposed Order
12. Email, dated January 2, 2020, from Defendants' Counsel to Court with Defendants' Proposed Order;
 - a. Defendants' Proposed Order
13. Motion to Alter, Amend and/or Reconsider Order Regarding Defendants' Motion to Compel Arbitration and Stay Action, filed January 19, 2020;
14. Notice of Appeal, including Proof of Service in Circuit Court, filed February 25, 2020.

I certify that this Designation of Matters contains no matter which is 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)

Matthew O. Riddle (SC Bar No. 76650)

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Attorneys for Appellants

Charleston, South Carolina

Dated: 7/27/21

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as Officer/Manager of THI of South Carolina at Camp Care, LLC,
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Appellants.

PROOF OF SERVICE

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
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Attorneys for Appellants

I, Russell G. Hines, of Young Clement Rivers, LLP, attorneys for Appellants, hereby certify that the **INITIAL BRIEF OF APPELLANTS and APPELLANTS' 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 the same in the U.S. Mail on July 27, 2020, properly posted for delivery to the following addressees:

Eric M. Poulin, Esquire
Roy T. Willey, IV, Esquire
Stefan B. Feidler, Esquire
Anastopoulo Law Firm, LLC
32 Ann Street
Charleston, SC 29403
Attorneys for Respondent

Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

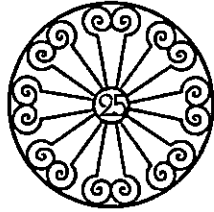
By: 

Russell G. Hines (SC Bar No. 72100)

Attorneys for Appellants

Charleston, South Carolina

Dated: 7/27/20



YCR LAW

Pollyana Bell
Project Assistant

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July 27, 2020

VIA US 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: Rita St. Aubin as Personal Representative of the Estate of Irene Ramsey Respondent v. THI of South Carolina at Camp Care, LLC d/b/a Lake Emory Post Acute Care; THI of South Carolina, LLC; Hunt Valley Holdings, LLC; THI of Baltimore, Inc.; and Casey Caddell as Officer/Manager of THI of South Carolina at Camp Care, LLC d/b/a Lake Emory Post Acute Care, Appellants.

Appellate Case no. 2020-000357

Case No.: 2020-000357

Claim No.: HBLM #: 1922072

YCR File: 14347-20190020

Dear Ms. Kitchings:

Enclosed please find an original and one (1) copy of the Initial Brief of Appellants, Appellants' Designation of Matter to be Included in the Record on Appeal, and Proof of Service for filing in the above-referenced matter. Kindly return a court-stamped copy of each in the self-addressed envelope.

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Pollyana Bell
Project Assistant

/pbb

Enclosures

cc (via US mail):

Eric M. Poulin, Esquire, Anastopoulos Law Firm, LLC
Roy T. Willey IV, Esquire, Anastopoulos Law Firm, LLC
Stefan B. Feidler, Esquire, Anastopoulos Law Firm, LLC

Hasler
07/27/2020
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RGH
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Court
South Carolina Court of Appeals
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