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AUG 17 2020

SC Court of Appeals

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

Appeal from Sumter County  
Court of Common Pleas

Kristi F. Curtis, Circuit Court Judge

Case No. 2017-CP-43-01740

Andrietta Atkinson and Debra Clyburn-Wilson,  
individually and as Personal Representatives  
of the Estate of Willie Mae Clyburn,

Respondents,

v.

SSC Sumter East Operating Company, LLC  
d/b/a Sumter East Health and Rehabilitation Center  
and Paul Granger,

Defendants.

Of whom SSC Sumter East Operating Company, LLC  
d/b/a Sumter East Health and Rehabilitation Center is

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)  
Alexandra J. Ginsberg (SC Bar No. 102251)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488  
*Attorneys for Appellant*

**Other Counsel of Record:**

HUGHEY LAW FIRM, LLC

D. Nathan Hughey

A. Stuart Hudson

Bradley H. Banyas

1311 Chuck Dawley Boulevard, Suite 201

Mount Pleasant, South Carolina 29464

P.O. Box 348 (29465)

(843) 881-8644

*Attorneys for Respondents*


Defendant SSC Sumter East Operating Company, LLC d/b/a Sumter East Health and Rehabilitation Center (“Appellant”), hereby appeals the following orders of the Honorable Kristi F. Curtis, Circuit Court Judge:

- Order Denying Motion to Compel Arbitration, filed June 25, 2020; and
- Form 4 Order filed July 14, 2020, denying motion to alter, amend, and/or reconsider.

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 July 14, 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: 8/13/20

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Appellant.

**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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(843) 720-5488


*Attorneys for Appellant*

I, Russell G. Hines, of Young Clement Rivers, LLP, attorneys for Appellant, hereby certify that Appellant's **NOTICE OF APPEAL** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on August 13, 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  
P.O. Box 348  
Mt. Pleasant, SC 29465  
*Attorneys for Respondents*

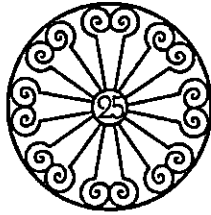
I also certify that a copy of this **NOTICE OF APPEAL** is this day, August 13, 2020, being E-Filed with the lower court (which will also, i.e., in addition to service by mail, effect service of the notice electronically on all counsel of record).

Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

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

Charleston, South Carolina

Dated: 8/13/20



# YCR LAW

Russell G. Hines  
Partner

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August 13, 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: Andrietta Atkinson and Debra Clyburn-Wilson, individually and as Personal Representatives of the Estate of Willie Mae Clyburn vs. SSC Sumter East Operating Company, LLC d/b/a Sumter East Health and Rehabilitation Center and Paul Granger  
Case No.: 2017-CP-43-1740  
Claim No.: 16-PL-000157061  
YCR File: 14653-20170472

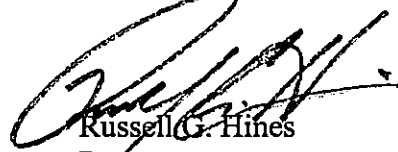
Dear Ms. Kitchings:

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



Russell G. Hines  
Partner

RGH/amj

Enclosures

cc via US Mail and E-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 via e-filing only: James C. Campbell, Sumter County Clerk of Court

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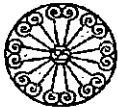
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