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SC Court of Appeals

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

Appeal from Spartanburg County
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

Appellate Case No. 2020-
Circuit Court Case No. 2018-CP-42-03421

Armando J. Acevedo, through his Attorney-in-Fact, Marianne
Acevedo,

Respondent,

v.

Hunt Valley Holdings, LLC; THI of South Carolina, LLC; and
THI of South Carolina at Camp Care, LLC, d/b/a Lake Emory
Post Acute Care,

Appellants.

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)
25 Calhoun Street, Suite 400 (29401)
P.O. Box 993
Charleston, South Carolina 29402
(843) 720-5488

Attorneys for Appellants

Other Counsel of Record:

Gary W. Poliakoff (SC Bar No. 4488)
Raymond P. Mullman, Jr. (SC Bar No. 8662)
Edward John Waelde (SC Bar No. 104275)
POLIAKOFF & ASSOCIATES, P.A.
215 Magnolia Street
Spartanburg, South Carolina 29306
P.O. Box 1571 (29304)
(843) 614-8888

Attorneys for Respondent

Defendants, Hunt Valley Holdings, LLC; THI of South Carolina, LLC; and THI of South Carolina at Camp Care, LLC, d/b/a Lake Emory Post Acute Care (collectively, "Appellants"), hereby appeal the following orders of the Honorable J. Derham Cole, Circuit Court Judge:


- Order Denying Motion to Compel Arbitration filed October 21, 2019;
- Form 4 Order regarding Defendants' Motion to Alter, Amend, and/or Reconsider Order Denying Motion to Compel Arbitration filed June 9, 2020; and
- Order Dated June 29, 2020, filed July 10, 2020.

Copies of the appealed orders are attached hereto and incorporated herein by reference. Appellants received written notice of entry of the most recent order on July 10, 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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Charleston, South Carolina 29402

(843) 720-5488

Attorneys for Appellants

Charleston, South Carolina

Dated: 8/10/20

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J. Derham Cole, Circuit Court Judge

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Appellants.

PROOF OF SERVICE

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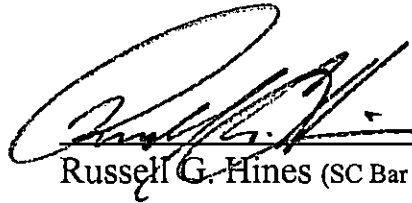
Attorneys for Appellants

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for the Appellant above named, do hereby certify that I have served the **NOTICE OF APPEAL** on the above-named Respondent by depositing a copy of the same in the United States Mail, postage prepaid, on August 10, 2020, addressed as follows to Respondent's counsel (and via E-filing the Notice of Appeal in the lower court, which will also effect service of the Notice of Appeal on Respondent's counsel):

Poliakoff & Associates, P.A.
Gary W. Poliakoff, Esquire
Raymond P. Mullman, Jr., Esquire
Edward John Waelde, Esquire
P.O. Box 1571
Spartanburg, SC 29304
Attorneys for Respondent

YOUNG CLEMENT RIVERS, LLP

By:

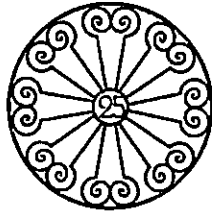


Russell G. Hines (SC Bar No. 72100)

Attorneys for Appellants

Charleston, South Carolina

Dated: 8/10/20



YCR LAW

Russell G. Hines
Partner

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August 10, 2020

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: Armando J. Acevedo, through his Attorney-In-Fact, Marianne Acevedo vs. Hunt Valley Holdings, LLC; THI of South Carolina, LLC; THI of South Carolina at Camp Care, LLC, d/b/a Lake Emory Post Acute Care and Rusty Flathmann
Case No.: 2018-CP-42-03421
Claim No.: HBLM #: 1822830
YCR File: 14347-20180125

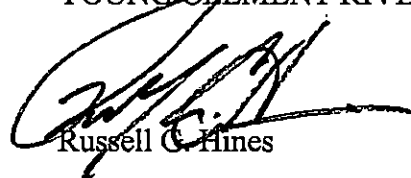
Dear Ms. Kitchings:

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

RGH/amj
Enclosures

cc via US Mail and E-Mail: Gary W. Poliakoff, Esquire, Poliakoff & Associates, P.A.
Raymond P. Mullman, Jr., Esquire, Poliakoff & Associates, P.A.
Edward John Waelde, Esquire, Poliakoff & Associates, P.A.
cc via e-filing only: Amy W. Cox, Spartanburg County Clerk of Court

Hasler

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