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

**RECEIVED**

AUG 19 2020

Appeal from Georgetown County  
Court of Common Pleas

**SC Court of Appeals**

Benjamin H. Culbertson, Circuit Court Judge

Case No. 2019-CP-22-00961

Kevin Greene,  
as Attorney in Fact for and on Behalf of  
Eleanor Greene Wragg,

Respondent,

v.

Palmetto Prince George Operating, LLC  
d/b/a Prince George Healthcare Center;  
Palmetto Health Care, LLC;  
Murray Forman, Individually; and  
Richard Porter, Individually,

Defendants.

Of whom Palmetto Prince George Operating, LLC  
d/b/a Prince George Healthcare Center;  
Palmetto Health Care, LLC; and  
Richard Porter, Individually, are

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)  
Matthew O Riddle (SC Bar No. 76650)  
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*

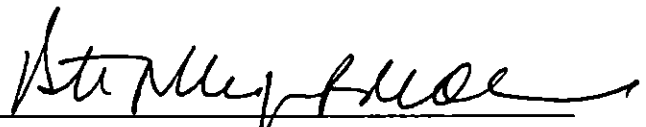
Defendants Palmetto Prince George Operating, LLC d/b/a Prince George Healthcare Center (the "Facility"); Palmetto Health Care, LLC ("PHC"); and Richard Porter, Individually ("Porter") (collectively, "Appellants"), hereby appeal the following orders of the Honorable Benjamin H. Culbertson, Circuit Court Judge:

- Form 4 Order filed June 17, 2020, denying PHC's motion to stay and the Facility and Porter's motions to compel arbitration; and
- Form 4 Order filed July 16, 2020, denying Appellants' motion to alter, amend, and/or reconsider.

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 16, 2020.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: 

Stephen L. Brown (SC Bar No. 66468)

D. Jay Davis, Jr. (SC Bar No. 12084)

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*Attorneys for Appellants*

Charleston, South Carolina

Dated: 8/17/20

**Other Counsel of Record:**

THE DERRICK LAW FIRM

Dirk J. Derrick (SC Bar No. 11278)

S. Taylor Hooven (SC Bar No. 103451)

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*Attorneys for Respondent*

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Defendants.

Of whom Palmetto Prince George Operating, LLC  
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Palmetto Health Care, LLC; and  
Richard Porter, Individually, are

Appellants.

**PROOF OF SERVICE**

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)  
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P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Appellants*

I, Russell G. Hines, of Young Clement Rivers, LLP, attorneys for Appellants, hereby certify that Appellants' **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 17, 2020, properly posted for delivery to the following addressees:

Dirk J. Derrick, Esquire  
S. Taylor Hooven, Esquire  
The Derrick Law Firm  
P.O. Box 28  
Conway, SC 29528

*Attorneys for Respondent*

I also certify that a copy of this **NOTICE OF APPEAL** is this day, August 17, 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).

YOUNG CLEMENT RIVERS, LLP

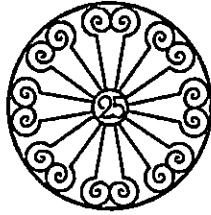
By: 

Russell G. Hines (SC Bar No. 72100)

*Attorneys for Appellants*

Charleston, South Carolina

Dated: 8/17/20



# YCR LAW

Pollyana Bell  
Project Assistant

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August 17, 2020

**RECEIVED**

AUG 19 2020

**SC Court of Appeals**

**VIA US MAIL**

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: Kevin Greene, as Attorney in Fact for and on behalf of Eleanor Greene  
Wragg v. Palmetto Prince George Operating, LLC d/b/a Prince George Healthcare  
Center; Palmetto Health Care, LLC, Murray Forman, Individually; and Richard  
Porter, Individually  
Case No.: 2019-CP-22-00961  
Claim No.: KBR File No. 705.725  
YCR File: 16729-20200085

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

With kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Pollyana Bell  
Project Assistant

/pbb

Enclosures

cc (via US mail and e-mail): S. Taylor Hooven, Esquire, The Derrick Law Firm  
Dirk J. Derrick, Esquire, The Derrick Law Firm

cc via e-filing only: Georgetown County Clerk of Court

