

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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AUG 26 2020

SC Court of Appeals

Appeal from Spartanburg County
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

Case No. 2017-CP-42-0326

Appellate Case No. 2020-000357

Rita St. Aubin, 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.

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

ANASTOPOULO LAW FIRM, LLC
Stefan B. Feidler (SC #101918)
Eric M. Poulin (SC #100209)
Roy T. Willey, IV (SC #101010)
32 Ann Street
Charleston, South Carolina 29403
Phone (843) 614-8888
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Attorneys for the Respondent

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

Pursuant to Rule 209, SCACR, the Respondent Rita St. Aubin, Personal Representative of the Estate of Irene Ramsey designates the following items for inclusion in the Record of Appeal:

Orders

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

Pleadings

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

Transcripts

4. Hearing Transcript from December 18, 2019;

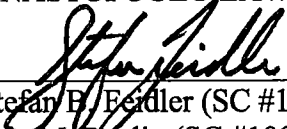
Motions, Memorandums, and/or other documents and materials

5. Defendants' Memorandum in Support of Motion to Stay Action and Compel Arbitration, filed December 13, 2019:
 - a. Exhibit A, Arbitration Agreement; and
 - b. Exhibit B, Power of Attorney.
6. Plaintiff's Memorandum in Opposition of Defendants' Motion to Stay Action and Compel Arbitration, filed December 17, 2019.
7. Defendants' Motion to Alter, Amend, and/or Reconsider Order Denying Defendants' Motion to Compel Arbitration and Stay Action, filed January 19, 2020.

The undersigned hereby certifies that this Designation contains no materials where are irrelevant to the appeal.

Respectfully submitted,

ANASTOPOULO LAW FIRM, LLC


Stefan B. Feidler (SC #101918)

Eric M. Boulton (SC #100209)

Roy T. Willey, IV (SC #101010)

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ATTORNEYS FOR RESPONDENT

This 24 day of 8 2020

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Appellants.

PROOF OF SERVICE

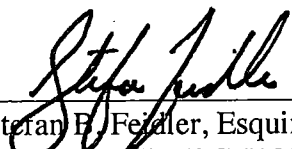
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Attorneys for the Respondent

I, Stefan B. Feidler, of the Anastopoulo Law Firm, attorney for Respondent, certify that I have served the **Initial Brief of Respondent** and **Respondent's Designation of Matter to be Included in the Record of Appeal** on all other parties to this matter by depositing a copy of the same in the United States Mail on August 24, 2020, addressed to and properly posted for delivery to the following addresses:

Russel G. Hines, Esquire
D. Jay Davis, Jr., Esquire
Stephen L. Brown, Esquire
Matthew O. Riddle, Esquire
Gaillard T. Dotterer, III, Esquire
Young Clement Rivers, LLP
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Attorneys for Appellants


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Attorneys for Respondent

Charleston, South Carolina

Dated: 8/24/2020

TOLL FREE: 1 (800) 313-2546
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REPLY TO NORTH CHARLESTON OFFICE
WWW.AKIMLAWFIRM.COM

ANASTOPOULO

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P. HEATH WARD (SC)
DANNY LEE WILLARD, JR. (SC)
L. CRAYTON WILLIAMS (SC)

*OF COUNSEL

August 24, 2020

Via U.S. 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, 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
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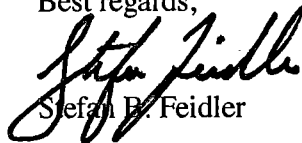
Appellate Case No. 2020-000357
Case No. 2017-CP-42-0326

Dear Ms. Kitchings,

I hope this letter finds you well. Enclosed, please find an original and one (1) copy of the Initial Brief of Respondent, Respondent's Designation of Matter to be Included in the Record on Appeal, and Proof of Service for filing the above-referenced matter. If you would be so kind, please return a court stamped copy of each in the self-address envelope.

Please feel free to contact me with any questions you may have.

Best regards,


Stefan B. Feidler

Enclosures

Cc: Russel G. Hines, Esquire (via U.S. Mail)
D. Jay Davis, Jr., Esquire (via U.S. Mail)
Stephen L. Brown, Esquire (via U.S. Mail)
Matthew O. Riddle, Esquire (via U.S. Mail)
Gaillard T. Dotterer, III, Esquire (via U.S. Mail)



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