

**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. 2017-CP-42-0326

Appellate Case No. 2020-000357

---

**RECEIVED**

OCT 07 2020

**SC Court of Appeals**

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 MOTION TO DISMISS APPELLANTS' APPEAL  
FOR FAILURE TO COMPLY WITH RULE 210, SCACR**

---

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  
Facsimile (843) 494-5536

*Attorneys for the Respondent*

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

COMES NOW Respondent Rita St. Aubin, Personal Representative of the Estate of Irene Ramsey ("Respondent"), by and through undersigned counsel, pursuant to Rule 260, SCACR, and moves to dismiss Appellants 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's ("Appellants") Appeal for failure to comply with Rule 210, SCACR, and subsequently Rule 211, SCACR.

On August 24, 2020, Respondent served Respondent's Initial Brief on Appellants. Appellants failed to serve a copy of the Record on Appeal on Respondent pursuant to Rule 210, SCACR. As of the date of this motion, Appellants have not served the Record on Appeal on Respondent and Respondent is unable to draft her Final Brief.

WHEREFORE, Respondent moves this Honorable Court to dismiss Appellants appeal for failure to comply with Rule 210, SCACR, and subsequently Rule 211, SCACR.

Respectfully submitted,

ANASTOPOULOU LAW FIRM, LLC

By: \_\_\_\_\_

Stefan B. Feldler (SC #101918)

Eric M. Poulin (SC #100209)

Roy T. Willey, IV (SC #101010)

32 Ann Street

Charleston, South Carolina 29403

Phone (843) 614-8888

Facsimile (843) 494-5536

*Attorneys for the Respondent*

Charleston, South Carolina

Dated: 10/5/2020

**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. 2017-CP-42-0326

Appellate Case No. 2020-000357

---

**RECEIVED**  
OCT 07 2020  
SC Court of Appeals

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.

---

**PROOF OF SERVICE**

---

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  
Facsimile (843) 494-5536

*Attorneys for the Respondent*

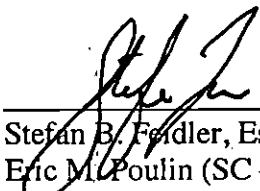
I, Stefan B. Feidler, of the Anastopoulo Law Firm, attorney for Respondent, certify that I have served **Respondent's Motion to Dismiss Appellants' Appeal** on all other parties to this matter by depositing a copy of the same in the United States Mail on October 5, 2020, addressed to and properly posted 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  
P.O. Bo. 993  
Charleston, South Carolina 29402

*Attorneys for Appellants*

Respectfully submitted,

ANASTOPOULO LAW FIRM, LLC



Stefan B. Feidler, Esquire (SC #101918)  
Eric M. Poulin (SC #100209)  
Roy T. Willey, IV (SC #101010)  
Anastopoulo Law Firm, LLC  
32 Ann Street  
Charleston, South Carolina 29403  
(843) 614-8888  
Facsimile (843) 494-5536

*Attorneys for Respondent*

Charleston, South Carolina

Dated: 10/5/2020

TOLL FREE: 1 (800) 313-2546  
FACSIMILE: (843) 494-5536

REPLY TO ANN STREET OFFICE  
WWW.AKIMLAWFIRM.COM

# ANASTOPOULO

---

## LAW FIRM

AKIMA A. ANASTOPOULO (SC)  
ERIC M. POULIN (SC)(NC)(GA)(CA)  
ROY T. WILLEY, IV (SC)

BLAKE ABBOTT (SC)  
JONATHAN N. ALKIS (SC)  
CONSTANCE ANASTOPOULO (SC)\*  
GUS ANASTOPOULO (SC)  
M. STEPHEN BLEVINS, JR. (SC)  
STEFAN B. FEIDLER (SC)(GA)  
MATTHEW T. FOSS (SC)  
IVEY B. FRANKLIN (SC)  
HERB F. GLASS (SC)(GA)\*\*  
THOMAS J. GODFREY (SC)(NC)  
JUSTIN S. HEMLEPP (FL)  
TRAVIS D. HILKA (SC)(NC)  
J. CAMDEN HODGE (SC)  
LANE D. JEFFERIES (SC)  
JOSHUA E. JONES (SC)  
BYRON V. LEARY, II (SC)  
BRIAN P. KERLEY (SC)  
ALEXIS W. MCCUMBER (SC)  
MATTHEW L. NALL (SC)(KY)  
INDIA D. SHAW (SC)(DC)  
R. CASEY VAN VALKENBURGH (SC)(IL)(MO)  
P. HEATH WARD (SC)  
D. LEE WILLARD, JR. (SC)  
L. CRAYTON WILLIAMS (SC)  
JARRETT E. WITHROW (SC)

\*OF COUNSEL  
\*\*PROVISIONAL LICENSE

October 5, 2020

Via US Mail

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

RE: *Estate of Irene Ramsey v. Lake Emory Post-Acute Care, LLC*  
Case No.: 2019-CP-42-03236

Dear Ms. Kitchings:

I hope this letter finds you well. Enclosed, please find Respondent's Motion to Dismiss Appellants' Appeal.

Please contact our office if you have any questions.

Sincerely,



CJ Hansen

Cc: Stephen L. Brown, Esquire (*via U.S. Mail*)

RECEIVED  
OCT 07 2020  
SC Court of Appeals

MAILING: 32 Ann Street, Charleston, South Carolina 29403

North Charleston: 2170 Ashley Phosphate Road, 3<sup>rd</sup> Floor, North Charleston, South Carolina 29406 \* Greenville: 418 River Street, Greenville, SC 29601  
Florence: 150 W. Evans Street, Florence, South Carolina 29501 \* Myrtle Beach: 2411 N. Oak Street, Suite 407, Myrtle Beach, South Carolina 29577  
Columbia: 1201 Main Street, Suite 1100, Columbia, South Carolina 29201 \* Charlotte, NC: 525 N. Tryon Street, Suite 1600, Charlotte, NC 28202  
Wilmington, NC: Appointment Only

PRESS FIRMLY TO SEAL

PRESS FIRMLY TO SEAL

PRIORITY MAIL  
FLAT RATE  
POSTAGE REQUIRED



# PRIORITY<sup>®</sup> MAIL

- Date of delivery specified\*
- USPS TRACKING<sup>™</sup> included to many major international destinations.
- Limited international insurance.
- Pick up available.\*
- Order supplies online.\*
- When used internationally, a customs declaration label may be required.
- Domestic only



PS000100014

EP14F Oct 2018  
OD: 12 1/2 x 9 1/2

**RECEIVED**  
OCT 07 2018  
SC Court of Appeals

To schedule free  
Package Pickup,  
scan the QR code.



USPS.COM/PICKUP

		<b>Click-N-Ship<sup>®</sup></b>	
<b>E</b>	<small>Serial Code</small> 9470 1036 9930 0053 1373 38 0265 0000 0022 9211	<small>US POSTAGE</small> Legal Fee (R) E (P)	
	<small>Legal Fee (R) E (P)</small>		
<small>1305/2020</small>	<small>Mailed from 29432</small>	<small>0625200001309</small>	
<b>PRIORITY MAIL EXPRESS 1-DAY<sup>™</sup></b>			
<small>Scheduled Delivery Date</small> 10/06/20		<b>0007</b>	
<b>CJ HANSEN</b> ANASTOPOULOU LAW FIRM 32 ANN ST CHARLESTON SC 29403-0212		<b>B012</b>	
<small>WAIVER OF SIGNATURE</small> SCHEDULED DELIVERY 12:00 PM			
<small>SHIP TO:</small> JENNY A KITCHINGS SOUTH CAROLINA COURT OF APPEALS PO BOX 11629 COLUMBIA SC 29211-1629			
<b>USPS TRACKING #</b>			
9470 1036 9930 0053 1373 38			

This package is the property of the U.S. Postal Service and is provided solely for use in sending Priority Mail shipments. Return may be required at Postal time. This packaging is not for resale. © U.S. Postal Service, October 2018. All rights reserved.

\* Domestic only. \*\* For Domestic shipments, the maximum weight is 70 lbs. For international shipments, the maximum weight is 4 lbs.