

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

J. Mark Hayes, II, Circuit Court Judge

Case No. 2017-CP-42-00219

RECEIVED

Dec 08 2020

SC Court of Appeals

Jo Ann Blackwell, Michelene Brooks, and Samuel H. Owens, Jr., individually and
on behalf of all others similarly situated,

Respondents,

v.

Mary Black Health System, LLC, d/b/a Mary Black Memorial Hospital; CHSPSC, LLC;
and Professional Account Services, Inc.,

Appellants,

NOTICE OF APPEAL

Mary Black Health System, LLC, d/b/a Mary Black Memorial Hospital (“Mary Black”),
CHSPSC, LLC (“CHSPSC”), Professional Account Services, Inc. (“PASI”) (collectively,
“Defendants”) appeal the Honorable J. Mark Hayes, II’s order denying Defendants’ Motion to
Dismiss or in the Alternative to Stay and Compel Arbitration, filed on September 4, 2020, and the
Honorable J. Mark Hayes, II’s order denying Defendants’ Rule 59(e) Motion to Alter or Amend,
filed December 8, 2020. Defendants received notice of the Court’s order denying Defendants’
Rule 59(e) Motion to Alter or Amend on December 8, 2020.

[Signature Page Attached]

s/Katon E. Dawson Jr.

James Lynn Werner, (SC Bar No. 6029)
Katon E. Dawson, Jr. (SC Bar No. 101167)
Parker Poe Adams & Bernstein LLP
1221 Main Street, Suite 1100
Columbia, SC 29201
(803) 255-8000
jimwerner@parkerpoe.com
katondawson@parkerpoe.com

*Attorneys for Appellants Mary Black Health System, LLC,
d/b/a Mary Black Memorial Hospital; CHSPSC, LLC; and
Professional Account Services, Inc.*

December 8, 2020
Columbia, South Carolina

Other Counsel of Record:

John B. White, Jr. (S.C. Bar No. 5996)
Marghretta H. Shisko (S.C. Bar No. 100106)
Griffin L. Lynch (S.C. Bar No. 72518)
Harrison White, P.C.
178 W. Main Street
P.O. Box 3547 (29304)
Spartanburg, SC 29306
(864) 585-5100
jwhite@spartanlaw.com
mshisko@spartanlaw.com
glynch@spartanlaw.com

John S. Simmons (S.C. Bar No. 10260)
Rachel G. Peavy (S.C. Bar # 69397)
Simmons Law Firm, LLC
1711 Pickens Street
Columbia, SC 29201
(803) 779-4600

*Attorneys for Respondents Jo Ann
Blackwell, Michelene Brooks, and Samuel
H. Owens, Jr.*

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Mary Black Health System, LLC, d/b/a Mary Black Memorial Hospital; CHSPSC, LLC; Professional Account Services, Inc.,

Appellants,

PROOF OF SERVICE

The undersigned hereby certifies that on December 8, 2020, copies of Mary Black Health System, LLC, d/b/a Mary Black Memorial Hospital, CHSPSC, LLC, Professional Account Services, Inc.'s **Notice of Appeal** were served on all counsel of record via email containing the above referenced document to counsels' individual AIS email addresses pursuant to SC Supreme Court COVID Order 2020-05-29-02 as follows:

John B. White, Jr. (S.C. Bar No. 5996)
Marghretta H. Shisko (S.C. Bar No. 100106)
Griffin L. Lynch (S.C. Bar No. 72518)
Harrison White, P.C.
178 W. Main Street
P.O. Box 3547 (29304)
Spartanburg, SC 29306
(864) 585-5100
jwhite@spartanlaw.com

mshisko@spartanlaw.com
glynch@spartanlaw.com

John S. Simmons (S.C. Bar No. 10260)
Rachel G. Peavy (S.C. Bar No. 69397)
Simmons Law Firm, LLC
1711 Pickens Street
Columbia, SC 29201
(803) 779-4600
jsimmons@simmonsfirm.com
rpeavy@simmonsfirm.com

*Attorneys for Respondents Jo Ann
Blackwell, Michelene Brooks, and Samuel
H. Owens, Jr.*

s/Katon E. Dawson Jr.
James Lynn Werner, (SC Bar No. 6029)
Katon E. Dawson, Jr. (SC Bar No. 101167)
Parker Poe Adams & Bernstein LLP
1221 Main Street, Suite 1100
Columbia, SC 29201
(803) 255-8000
jimwerner@parkerpoe.com
katondawson@parkerpoe.com

*Attorneys for Appellants Mary Black Health System, LLC,
d/b/a Mary Black Memorial Hospital; CHSPSC, LLC; and
Professional Account Services, Inc.*

December 8, 2020
Columbia, South Carolina

From: [Dawson, Jr., Katon E.](#)
To: ["Rachel Peavy"; John Simmons; Shisko, Marghretta; Duke White; "jwhite@spartanlaw.com"; Griffin Lynch; Chris Jones](#)
Cc: [Catherine Mongell; Lorrie Large; Werner, James L.; Nicole M. Rice; Werner, James L.; Andrews, Tricia; Ellison, Sherrie R.; Thomas, William R.](#)
Subject: Blackwell v. Mary Black Re: Notice of Appeal
Date: Tuesday, December 8, 2020 1:18:52 PM
Attachments: [Notice of Appeal Mary Black.pdf](#)
[Filed Order Denying Motion to Compel Arbitration Mary Black.pdf](#)
[Filed Order Denying Motion to Alter or Amend Mary Black.pdf](#)

Jo Ann Blackwell, Michelene Brooks, and Samuel H. Owens, Jr., individually and on behalf of all others similarly situated, v. Mary Black Health System, LLC, d/b/a Mary Black Memorial Hospital; CHSPSC, LLC; and Professional Account Services, Inc.

Case No. 2017-CP-42-00219

Good Afternoon,

Attached please find the Notice of Appeal that will be filed with the Court of Appeals today.

Katon Dawson

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Dec 08 2020
SC Court of Appeals



Katon E. Dawson, Jr.
Associate
t: 803.253.6854
f: 803.255.8017
katondawson@parkerpoe.com

Atlanta, GA
Charleston, SC
Charlotte, NC
Columbia, SC
Greenville, SC
Raleigh, NC
Spartanburg, SC
Washington, DC

December 8, 2020

Via E-mail [ctappfilings@sccourts.org] and U.S. Mail

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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Dec 08 2020
SC Court of Appeals

Re: ***Jo Ann Blackwell, Michelene Brooks, and Samuel H. Owens, Jr., individually and on behalf of all others similarly situated, v. Mary Black Health System, LLC, d/b/a Mary Black Memorial Hospital, CHSPSC, LLC, and Professional Account Services, Inc.***
Case Number: 2017-CP-42-00219

Dear Mrs. Kitchings,

Enclosed for filing please find Appellants Mary Black Health System, LLC; d/b/a Mary Black Memorial Hospital; CHSPSC, LLC; Professional Account Services, Inc.'s Notice of Appeal in the above referenced matter. Also enclosed please find, copies of the orders to be challenged on appeal, the Proof of Service, and this Firm's check in the amount of \$250.00 in satisfaction of the Court of Appeals' filing fee.

By copy of this correspondence, we are serving all counsel of record with a copy of the Notice of Appeal. A copy of this Notice of Appeal will also be filed electronically with the Spartanburg County Clerk of Court. Should you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

Katon E. Dawson, Jr.

KED
Enclosures

PPAB 5944157v1

December 8, 2020
Page 2

Cc:

John B. White, Jr. (jwhite@spartanlaw.com) (via Email)
Marghretta H. Shisko (mshisko@spartanlaw.com) (via Email)
Griffin L. Lynch (glynch@spartanlaw.com) (via Email)
John S. Simmons (jimmmons@simmonsfirm.com) (via Email)
Rachel G. Peavy (rpeavy@simmonsfirm.com) (via Email)