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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 10 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.

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*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:

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Blackwell, Michelene Brooks, and Samuel  
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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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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; Professional Account Services, Inc.,

Appellants,

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**PROOF OF SERVICE**

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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:

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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, Marohretta; 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](#)

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***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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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 10 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](mailto:jwhite@spartanlaw.com)) (via Email)

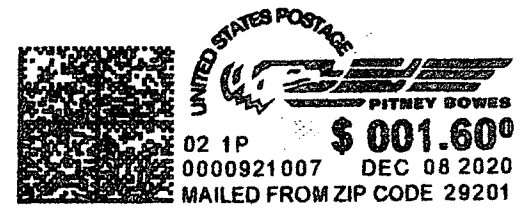
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The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201