

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

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Appeal from Georgetown County  
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

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Case No. 2019-CP-22-00961  
Appellate Case No. 2020-001167

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

**RECEIVED**

**Jan 19 2021**

**SC Court of Appeals**

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 Health Care Center;  
Palmetto Health Care, LLC; and  
Richard Porter, Individually, are

Appellants.

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

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THE DERRICK LAW FIRM, P.C.  
Dirk J. Derrick (SC Bar No. 11278)  
S. Taylor Hooven (SC Bar No. 103451)  
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Conway, SC 29526  
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*Attorneys for Respondent*

Respondent agrees with Appellants' Designation of Matter to be included in the Record on Appeal, and further agrees that duplication of material may be reasonably avoided by causing duplicative material to appear only one in the Record on Appeal.

However, Respondent requests that all material proposed for inclusion in the Record on Appeal bear any time, date, and/or case number filing stamp affixed, electronically or otherwise, by or at the direction of the Clerk of Court for the Court of Common Pleas of Georgetown County, if applicable.

I certify that this Designation of Matter contains no matter irrelevant to this appeal.

Respectfully submitted,

THE DERRICK LAW FIRM, P.C.

By: s/ S. Taylor Hooven  
Dirk J. Derrick, Esq. (S.C. Bar No. 11278)  
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*Attorneys for Respondent*

Conway, South Carolina  
January 18, 2021

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Appellants.

PROOF OF SERVICE

THE DERRICK LAW FIRM, P.C.  
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*Attorneys for Respondent*

I, S. Taylor Hooven, of The Derrick Law Firm, P.C., attorneys for Respondent, hereby certify that the **INITIAL BRIEF OF RESPONDENT** and **RESPONDENT'S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** were served on all other parties to this matter on January 18, 2021, via email (see attached) to their following counsel of record:

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Respectfully submitted,

THE DERRICK LAW FIRM, P.C.

By: s/ S. Taylor Hooven  
S. Taylor Hooven (SC Bar No. 103451)

*Attorneys for Respondent*

Conway, South Carolina  
January 18, 2021

**From:** [Taylor Hooven](#)  
**To:** [sbrown@ycrlaw.com](mailto:sbrown@ycrlaw.com); [Davis, Jay](mailto:Davis_Jay); [rhines@ycrlaw.com](mailto:rhines@ycrlaw.com); [mriddle@ycrlaw.com](mailto:mriddle@ycrlaw.com); [gdotterer@ycrlaw.com](mailto:gdotterer@ycrlaw.com)  
**Subject:** Greene v. Palmetto Prince George // App. Case No. 2020-001167 // SERVICE Initial Brief of Respondent and Respondent Designation of Matter  
**Date:** January 18, 2021 10:03:07 AM  
**Attachments:** [App. Case No. 2020-001167 \(Greene v. Palmetto Prince George\) -- Initial Brief of Respondent.pdf](#)  
[App. Case No. 2020-001167 \(Greene v. Palmetto Prince George\) -- Respondent Designation of Matter for Inclusion in Record on Appeal.pdf](#)

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Good morning all,

Attached are Respondent's Initial Brief and Respondent's Designation of Matter for Inclusion in Record on Appeal, served upon you via email only in accordance with Supreme Court of South Carolina Order 2020-05-29-02(g)(3).

Thank you,

TH

Taylor Hooven

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