

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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Jun 02 2021

SC Court of Appeals

Appeal from Florence County
Court of Common Pleas

William H. Seals Jr., Circuit Court Judge

Case No. 2020-CP-21-02290

Mary Tisdale
as Personal Representative of the Estate of Earlene Seabrook,

Respondent,

v.

Palmetto Lake City Operating, LLC
d/b/a Lake City-Scranton Healthcare Center
and Jeffrey Gibbs,

Defendants,

Of whom Palmetto Lake City Operating, LLC
d/b/a Lake City-Scranton Healthcare Center is

Appellant.

NOTICE OF APPEAL

CLEMENT RIVERS, LLP

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D. Jay Davis, Jr. (SC Bar No. 12084)

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Attorneys for Respondent

Defendant, Palmetto Lake City Operating, LLC, d/b/a Lake City-Scranton Healthcare Center (“Appellant”), hereby appeals the following orders of the Honorable William H. Seals Jr., Circuit Court Judge:

- **Order Denying Defendant’s Motion to Stay Action and Compel Arbitration**, filed March 1, 2021, and
- **Order Denying Defendant’s Motion to Alter, Amend, and/or Reconsider Arbitration**, filed May 4, 2021.

Copies of the appealed orders are attached hereto and incorporated herein by reference. Appellant received written notice of entry of the most recent order on May 4, 2021.

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Stephen L. Brown (SC Bar No. 66468)
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Of whom Palmetto Lake City Operating, LLC
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Appellant.

PROOF OF SERVICE

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Attorneys for Appellant

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, hereby certify that Appellant's **NOTICE OF APPEAL** was served on Respondent, Mary Tisdale, as Personal Representative of the Estate of Earlene Seabrook, on June 2, 2021, by emailing (see attached) a copy of the same to Respondent's counsel of record:

D. Nathan Hughey, Esquire
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Attorneys for Respondent

I also certify that a copy of this **NOTICE OF APPEAL** is this day, June 2, 2021, being E-Filed with the lower court (which will also, i.e., in addition to service by email, effect service of the notice today on Respondent's above-identified counsel of record via the E-Filing System).

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines (SC Bar No. 72100)

Attorneys for Appellant

Charleston, South Carolina

June 2, 2021

From: [Hines, Russell](#)
To: nate@hugheylawfirm.com; stuart@hugheylawfirm.com; [Brad Banyas](#)
Cc: ["Brown, Steve"](#); [Davis, Jay](#); [Riddle, Matthew](#); [Dotterer III, Gaillard T. \(Gilly\)](#); [Justman, Aimee](#); [Bell, Pollyana \(Polly\)](#); [Wakeham, Rebecca \(Becky\)](#); [McNeil, Tasha](#)
Subject: Tisdale v. Palmetto Lake City (Circuit Court Case No. 2020-CP-21-02290) -- Notice of Appeal
Date: Wednesday, June 2, 2021 11:43:59 PM
Attachments: [image001.png](#)
[Tisdale v. Palmetto Lake City -- Notice of Appeal.pdf](#)
[Appealed Order filed 3-1-21.pdf](#)
[Appealed Order filed 5-4-21.pdf](#)

Attached please find Appellant's **Notice of Appeal** in the above-referenced matter, along with copies of the **Appealed Orders** referenced in the notice.

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