

**RECEIVED**

**Jan 07 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas

William H. Seals, Jr., Circuit Court Judge

---

Appellate Case No. 2021-000586

---

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.

---

**INITIAL BRIEF OF RESPONDENT**

---

The undersigned hereby certifies that, on January 7, 2021, he served Appellant’s counsel with a Respondent’s Initial Brief and Designation of Matter to be Included in the Record on Appeal at the email addresses listed below pursuant to Section (g)(3) of the South Carolina Supreme Court’s March 20, 2020 order (Order No. 2020-03-20-01):

- sbrown@ycrlaw.com
- jdavis@ycrlaw.com
- rhines@ycrlaw.com
- gdotterer@ycrlaw.com
- mriddle@ycrlaw.com

/s/ Jordan C. Calloway  
Attorney for Respondent

## M. Tisdale v. Palmetto Lake City Operating, LLC (Appellate Case No. 2021-000586)

Jordan Calloway <jordan@mcgowanhood.com>

Fri 1/7/2022 11:46 AM

To: sbrown@ycrlaw.com <sbrown@ycrlaw.com>; Davis, Jay (jdavis@ycrlaw.com) <jdavis@ycrlaw.com>; Hines, Russell <RHines@ycrlaw.com>; gdotterer@ycrlaw.com <gdotterer@ycrlaw.com>; mriddle@ycrlaw.com <mriddle@ycrlaw.com>

Cc: Brad Banyas <brad@hugheyfirm.com>; Stuart Hudson <stuart@hugheyfirm.com>; Nate Hughey <nate@hugheyfirm.com>

 2 attachments (332 KB)

M. Tisdale--Initial Brief of Respondent FINAL PDF.pdf; M. Tisdale--Designation of Matter (Initial Br. of Resp.) PDF.pdf;

Counsel:

I am attaching Respondent's Initial Brief and a Designation of Matter to be Included in the Record on Appeal that are being electronically filed today with the Court of Appeals. Pursuant to Rule 262(c)(3), SCACR and Section (d)(1) of the South Carolina Supreme Court's August 25, 2021, order (Order No. 2021-08-25-02), please consider this email as service for both documents.

Thanks,

Jordan Calloway  
McGowan, Hood & Felder, LLC  
1539 Health Care Drive  
Rock Hill, SC 29732  
(803) 327-7800