

**RECEIVED**

**Mar 09 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

---

Case No. 2020-CP-21-02290  
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.

---

**PROOF OF SERVICE**

---

**CLEMENT RIVERS, LLP**

Stephen L. Brown (SC Bar No. 66468)

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

Matthew O. Riddle (SC Bar No. 76650)

Russell G. Hines (SC Bar No. 72100)

Gaillard T. Dotterer, III (SC Bar No. 103620)

25 Calhoun Street, Suite 400

Charleston, South Carolina 29401

P.O. Box 993 (29402)

(843) 720-5488

*Attorneys for Appellant*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, hereby certify that the **RECORD ON APPEAL** was served on all other parties to this appeal on March 9, 2022, via email (see attached) to the following counsel of record:

D. Nathan Hughey, Esquire  
[nate@hugheylawfirm.com](mailto:nate@hugheylawfirm.com)

A. Stuart Hudson, Esquire  
[stuart@hugheylawfirm.com](mailto:stuart@hugheylawfirm.com)

Bradley H. Banyas, Esquire  
[brad@hugheylawfirm.com](mailto:brad@hugheylawfirm.com)

Hughey Law Firm, LLC  
P.O. Box 348  
Mt. Pleasant, SC 29465

*and*

Jordan C. Calloway, Esquire  
[jordan@mcgowanhood.com](mailto:jordan@mcgowanhood.com)

McGowan, Hood & Felder, LLC  
1539 Health Care Drive  
Rock Hill, SC 29732

*Attorneys for Respondent*

Respectfully submitted,  
CLEMENT RIVERS, LLP

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

*Attorneys for Appellant*

Charleston, South Carolina

March 9, 2022

## Bell, Pollyana (Polly)

---

**From:** Bell, Pollyana (Polly)  
**Sent:** Wednesday, March 9, 2022 10:52 AM  
**To:** 'nate@hugheyfirm.com'; 'stuart@hugheyfirm.com'; 'Brad Banyas';  
'jordan@hugheyfirm.com'; 'Jordan Calloway'  
**Cc:** Hines, Russell; Justman, Aimee  
**Subject:** Appellate Case No. 2021-000586; Tisdale v. Palmetto Lake City  
**Attachments:** ROA .pdf

Enclosed please find the Record on Appeal in the above-referenced matter which will be filed today.

Thank you,

Pollyana Bell  
Project Assistant  
Commercial Litigation Practice Group  
Phone:(843)720-5488 | Fax:(843)579-1369



**CLEMENT RIVERS, LLP**  
25 Calhoun Street • Suite 600 • Charleston, SC 29401  
FOR COUNSEL