

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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Sep 15 2022

S.C. SUPREME COURT

Appeal from Charleston County
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

Appellate Case No. 2019-001413
Circuit Court Case No. 2018-CP-10-01251

Richard Ladson, Jr.,
by and through Richard Miles Ladson, Sr., POA,

Respondent,

v.

THI of South Carolina at Charleston, LLC
d/b/a Riverside Health and Rehab,

Petitioner.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
Russell G. Hines (SC Bar No. 72100)
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Attorneys for Petitioner

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioner, hereby certify that the **MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI** was served on Respondent, on September 15, 2022, by emailing (see attached) a copy of the same to Respondent's counsel of record:

Carl E. Pierce, II, Esquire
Benjamin C. Smoot, II, Esquire
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carlpierce@piercesloan.com
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Attorneys for Respondent

I also certify that Petitioner's **MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI** and **PROOF OF SERVICE** was filed with the South Carolina Court of Appeals on September 15, 2022, via email (see attached) to ctappfilings@sccourts.org.

Respectfully submitted,
CLEMENT RIVERS, LLP

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

Attorneys for Petitioner

Charleston, South Carolina

September 15, 2022

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Thursday, September 15, 2022 2:44 PM
To: 'carlpierce@piercesloan.com'; 'bensmoot@piercesloan.com'; Trey Pierce III; Kelly Forrester
Cc: Hines, Russell; Justman, Aimee
Subject: Ladson v. THI // Appellate Case No. 2019-001413
Attachments: Mtn for Ext to Serve-File Petition for Writ of Cert.pdf

Enclosed please find Petitioner's Motion for Extension of Time to Serve/File Petition for Writ of Certiorari which will be filed today in the above-referenced matter.

Thank you,

Pollyana Bell
Project Assistant
Commercial Litigation Practice Group
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