

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

**RECEIVED**

**Nov 22 2022**

**S.C. SUPREME COURT**

Appeal from Charleston County  
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

Circuit Court Case No. 2018-CP-10-01251

Court of Appeals Case No. 2019-001413

Unpublished Opinion No. 2022-UP-169 (S.C. Ct. App. Filed April 6, 2022)

Supreme Court Case No. 2022-001286

Estate of Richard Ladson, Jr.,  
By and through Personal Representative                      Respondent,  
Richard Miles Ladson, Sr.

v.

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

**CERTIFICATE OF SERVICE FOR RESPONDENT'S RETURN TO  
APPELLANT'S PETITION FOR WRIT OF CERTIORARI**

PIERCE, SLOAN, KENNEDY, & EARLY,  
LLC

Carl E. Pierce, II, (SC Bar No. 7946)

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Charleston, South Carolina 29413

843-722-7733

*Attorneys for Respondent Estate of Richard  
Ladson, Jr., by and through Personal  
Representative Richard Miles Ladson, Sr.*

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**PROOF OF SERVICE**

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I, Benjamin Catlett Smoot II, of Pierce Sloan LLC counsel for Respondent Richard Ladson, Jr., by and through Personal Representative Richard Miles Ladson, Sr., POA, hereby certify that the foregoing **Respondent's Return to Appellant's Petition for Writ of Certiorari** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on November 22, 2022, properly posted for delivery to the following address:

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*Attorneys for Petitioner*

Respectfully Submitted,

PIERCE | SLOAN, LLC

*s/ Benjamin C. Smoot, II*

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November 22, 2022  
Charleston, South Carolina