

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

RECEIVED

Dec 02 2022

S.C. SUPREME COURT

Appeal from Greenville County
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

Case No. 2019-CP-23-00473

Court of Appeals Case No. 2019-001955
Unpublished Opinion No. 2022-UP-203 (S.C. Ct. App. filed May 18, 2022)

Supreme Court Case No. 2022-001406

Estate of Patricia Royston, by and through
the appointed Personal Representative, Marianne McCoig,
Individually, and on behalf of the statutory beneficiaries, Respondent,

v.

Hunt Valley Holdings, LLC
a/k/a Fundamental Long Term Care Holdings, LLC;
Fundamental Clinical and Operational Services, LLC;
Fundamental Administrative Services, LLC; and
THI of South Carolina at Magnolia Place at Greenville, LLC,
d/b/a Magnolia Place-Greenville, Petitioners.

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)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Petitioners

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioners, hereby certify that Petitioners' **REPLY TO RETURN TO PETITION FOR A WRIT OF CERTIORARI** was served on Respondent on December 2, 2022, by emailing (see attached) a copy of the same to Respondent's counsel of record:

Gary W. Poliakoff, Esquire
atty@gpoliakoff.com

Raymond P. Mullman, Jr., Esquire
rmullmanjr@gmail.com
POLIAKOFF & ASSOCIATES, P.A.

and

Matthew W. Christian, Esquire
mchristian@cclawfirm.com
CHRISTIAN & CHRISTIAN, LLC

and

Jordan C. Calloway, Esquire
jcalloway@mcgowanhood.com
MCGOWAN, HOOD & FELDER, LLC

Attorneys for Respondent

Respectfully submitted,
CLEMENT RIVERS, LLP

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

Attorneys for Petitioners

Charleston, South Carolina

December 2, 2022

From: [Hines, Russell](#)
To: "[atty@gpoliakoff.com](#)"; [Ray Mullman \(rmullmanjr@gmail.com\)](#); [Matt Christian](#); "[jcalloway@mcgowanhood.com](#)"
Cc: "[Brown, Steve](#)"; [Davis, Jay](#); [Peterson, Susan](#); [Wakeham, Rebecca \(Becky\)](#); [Bell, Pollyana \(Polly\)](#); [Justman, Aimee](#)
Subject: Royston v. Hunt Valley Holdings (Sup. Ct. Case No. 2022-001406) -- Reply to Return to Petition for a Writ of Certiorari
Date: Friday, December 2, 2022 9:24:22 PM
Attachments: [image001.png](#)
[Royston v. Hunt Valley \(Sup. Ct. 22-1406\) -- Reply to Return to Petition for a Writ of Certiorari.pdf](#)

Attached regarding the above-referenced matter, please find our **Reply to Return to Petition for a Writ of Certiorari**.

Russell G. Hines
CLEMENT RIVERS, LLP
www.ycrlaw.com
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
Phone: (843) 720-5488
Fax: (843) 579-1327
Email: rhines@ycrlaw.com



CLEMENT RIVERS, LLP

25 Calhoun Street • Suite 400 • Charleston, SC 29401
ycrlaw.com