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SC Court of Appeals

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

Appeal from Spartanburg County
Court of Common Pleas

R. Keith Kelly, Circuit Court Judge

Cases No. 2019-CP-42-03708 and 2019-CP-42-03709

Appellate Case No. 2022-001059

Kenneth Pace,
Individually and as Personal Representative of
the Estate of Earl E. Pace,

Respondent,

v.

Lake Emory Post Acute Care; THI of South Carolina at Camp
Care, LLC; THI of South Carolina, LLC; THI of Baltimore, Inc.;
Fundamental Administrative Services, LLC; Fundamental
Clinical and Operational Services, LLC; Fundamental Clinical
Consulting, LLC; Fundamental Long Term Care Holdings, LLC;
and Kerry L. Wheeler, DO,

Defendants,

Of which Lake Emory Post Acute Care; THI of South Carolina at
Camp Care, LLC; THI of South Carolina, LLC; THI of
Baltimore, Inc.; Fundamental Administrative Services, LLC;
Fundamental Clinical and Operational Services, LLC; and
Fundamental Long Term Care Holdings, LLC, are

Appellants.

PROOF OF SERVICE

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I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that the **INITIAL BRIEF OF APPELLANTS and APPELLANTS' DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** were served on Respondent and on Defendant Kerry L. Wheeler, DO, on February 8, 2023, by emailing (see attached) a copy of the same to their counsel of record:

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Respectfully submitted,

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February 8, 2023

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Cc: [Justman, Aimee](#); [Bell, Pollyana \(Polly\)](#); [Davis, Jay](#); "[Brown, Steve](#)"; [Phillips, Ashton](#); [Peterson, Susan](#); [Wakeham, Rebecca \(Becky\)](#)
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Attachments: [image002.png](#)
[Pace v. Lake Emory \(Appeal No. 2022-001059\) -- Initial Brief of Appellants.pdf](#)
[Pace v. Lake Emory \(Appeal No. 2022-001059\) -- Appellants' Designation of Matter.pdf](#)

Attached regarding the above-referenced case please find the **Initial Brief of Appellants and Appellants' Designation of Matter to be Included in the Record on Appeal.**

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