

**RECEIVED**

**Feb 22 2023**

**SC Court of Appeals**

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

---

Appeal from Greenville County  
Court of Common Pleas

Alex Kinlaw, Jr., Circuit Court Judge

---

Case No. 2020-CP-23-01728  
Appellate Case No. 2022-000398

---

Debbie Stroud,  
Guardian ad Litem for James C. Stroud,

Respondent,

v.

THI of South Carolina at Greenville, LLC  
d/b/a Magnolia Manor-Greenville,  
THI of Baltimore, Inc., and  
THI of South Carolina, LLC,

Appellants.

---

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

*Attorneys for Appellants*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that the **FINAL BRIEF OF APPELLANTS** and **APPELLANTS' CERTIFICATION FOR FINAL BRIEF** were served on Respondent on February 22, 2023, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

C. Daniel Pruitt, Esquire  
danlaw@bellsouth.net  
300 Pettigru Street  
Greenville, SC 29601  
*Attorney for Respondent*

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Russell G. Hines (SC Bar No. 72100)  
*Attorneys for Appellants*

Charleston, South Carolina

February 22, 2023

## Bell, Pollyana (Polly)

---

**From:** Bell, Pollyana (Polly)  
**Sent:** Wednesday, February 22, 2023 3:03 PM  
**To:** 'danlaw@bellsouth.net'; 'dan@danpruittlaw.com'  
**Cc:** Hines, Russell; Justman, Aimee  
**Subject:** Stroud v. THI // 2022-000398 (CR 191015)  
**Attachments:** Stroud - Final Brief of Appellants.pdf; Stroud - Cert for Final Brief of Appellants.pdf; Stroud - Final Reply Brief of Appellants.pdf; Stroud - Cert for Final Reply Brief of Appellants.pdf

Enclosed please find Appellants' Final Brief, Final Reply Brief, and Certifications for each which will be filed today in the above-referenced matter.

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 OFFICE