

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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Mar 29 2023

SC Court of Appeals

Appeal from Pickens County
Court of Common Pleas

G.D. Morgan, Jr., Circuit Court Judge

Cases No. 2021-CP-39-01127 and -01128
Appellate Case No. 2023-000033

Deonda Weldon, Individually and as
Personal Representative of the Estate of Earline Cooley, Appellant,

v.

Dominion Clemson, LLC d/b/a Dominion Senior Living at
Patrick Square; Dominion Senior Living, LLC; Dominion
Clemson, II, LLC; Dominion Management Group, LLC; and
Dominion Group, LLC, Respondents.

PROOF OF SERVICE

Russell G. Hines (SC Bar No. 72100)
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Attorneys for Respondents

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Respondents, hereby certify that **RESPONDENTS' MOTION (1) FOR LEAVE TO MAKE RULE 60, SCRPC, MOTION, OR, ALTERNATIVELY, (2) FOR IMMEDIATE REVERSAL AND REMAND PURSUANT TO *WIDENER V. FORT MILL FORD*, AND, IF NECESSARY, (3) TO STAY/EXTEND BRIEFING DEADLINE** was served on all other parties to this matter on March 29, 2023, by emailing (see attached email) a copy of the same to their counsel of record:

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Respectfully submitted,

By: s/Russell G. Hines
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Charleston, South Carolina

March 29, 2023

Hines, Russell

From: Hines, Russell
Sent: Wednesday, March 29, 2023 7:30 PM
To: 'mchristian@cclawfirm.com'; 'jcalloway@mcgowanhood.com'; 'Josh Thompson'; 'pboulier@btblawfirm.com'; 'aylaluers@gmail.com'
Cc: Bell, Pollyana (Polly); Justman, Aimee
Subject: Weldon v. Dominion Clemson (Appellate Case No. 2023-000033) -- (1) Notice of Appearance/Motion to Withdraw and (2) Motion for Leave etc.
Attachments: Exhibit 1 -- Complaints.pdf; Exhibit 2 -- Answers.pdf; Exhibit 3 -- Motions to Compel Arbitration.pdf; Exhibit 4 -- Form and Formal Orders Granting Motions to Compel Arbitration.pdf; Exhibit 5-- Notices of Appeal.pdf; Weldon v. Dominion Clemson (2023-000033) -- Notice of Appearance and Mot. to Withdraw.pdf; Weldon v. Dominion Clemson (2023-000033) -- Motion to for Leave under Rule 60 etc.pdf

Attached for service regarding the above-referenced matter please find the **Notice of Appearance of Attorney Hines and Motion to Withdraw Attorneys Boulier and Connor and Respondents' Motion (1) For Leave to Make Rule 60, SCRPC, Motion, or, alternatively, (2) For Immediate Reversal and Remand Pursuant to *Widener v. Fort Mill Ford*, and, if necessary, (3) To Stay/Extend Briefing Deadline** (and Exhibits 1-5 thereto).

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