

THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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May 15 2023

S.C. SUPREME COURT

Appeal from Spartanburg County  
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

Case No. 2018-CP-42-04405  
Court of Appeals Case No. 2019-001731  
Opinion No. 5963 (S.C. Ct. App. Filed January 25, 2023)

The Estate of Mary Solesbee, by her personal  
representative, Connie Bayne,

Respondent,

v.

Fundamental Clinical and Operational Services, LLC;  
Fundamental Administrative Services, LLC; THI of  
South Carolina at Magnolia Manor-Inman, LLC d/b/a  
Magnolia Manor-Inman; Inpatient Consultants of North  
Carolina, P.C.; and Angela Brown, ACNP,

Defendants,

Of which Fundamental Clinical and Operational  
Services, LLC; Fundamental Administrative Services,  
LLC; and THI of South Carolina at Magnolia Manor-  
Inman, LLC d/b/a Magnolia Manor-Inman are the

Petitioners.

PROOF OF SERVICE

CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
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*Attorneys for Petitioners*

I, Russell G. Hines, of Clement Rivers, LLP, counsel for Petitioners, hereby certify that Petitioners' **MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR A WRIT OF CERTIORARI** was served on all other parties to this appeal on May 15, 2023, via email (see attached) to their following counsel:

W. Harold Christian, Jr., Esquire  
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*-and-*

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*Attorneys for Respondent*

I also certify that Petitioners' **MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR A WRIT OF CERTIORARI** and **PROOF OF SERVICE** was filed with the South Carolina Court of Appeals on May 15 2023, via email to [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org).

Respectfully submitted,  
CLEMENT RIVERS, LLP

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

Charleston, South Carolina

May 15, 2023

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Monday, May 15, 2023 12:02 PM  
**To:** hchristian@cclawfirm.com; 'mchristian@cclawfirm.com';  
'jcalloway@mcgowanhood.com'  
**Cc:** Hines, Russell; Justman, Aimee  
**Subject:** Solesbee v. Fundamental (Ct. App. 19-001731) - CR 180793  
**Attachments:** Solesbee v. Fundamental (Ct. App. 19-001731) -- Mot. for Ext re Cert Pet.pdf

Enclosed please find Petitioners' Motion for Extension of Time to Serve/File Petition for a Writ of Certiorari which will be filed today in the above-referenced matter.

Thank you,

Pollyana Bell  
Project Assistant  
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