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May 24 2023

S.C. SUPREME COURT

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

Appeal from Spartanburg County
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

Case No. 2018-CP-42-04405

Appellate No. 2023-000777

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 Appellants, hereby certify that Petitioners' **SECOND 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 24, 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 Petitioner's **SECOND 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 24 2023, via email to 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 24, 2023

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Wednesday, May 24, 2023 11:30 AM
To: 'hchristian@cclawfirm.com'; 'mchristian@cclawfirm.com';
'jcalloway@mcgowanhood.com'
Cc: Hines, Russell; Justman, Aimee
Subject: Solesbee v. Fundamental (Sup. Ct. 23-000777 // Ct. App. 19-001731) - CR 180793
Attachments: 2nd Mtn for Ext-Petition for Writ of Cert.pdf

Enclosed please find Petitioners' Second 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
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