

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

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Jun 05 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)

Supreme Court Case No. 2023-000777

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' **PETITION FOR A WRIT OF CERTIORARI** was served on all other parties to this appeal on June 5, 2023, via email (see attached) to their following counsel:

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-and-

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Attorneys for Respondent

I also certify that Petitioners' **PETITION FOR A WRIT OF CERTIORARI** and **PROOF OF SERVICE** was filed with the South Carolina Court of Appeals on June 5 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

June 5, 2023

From: [Hines, Russell](#)
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Cc: [Justman, Aimee](#); [Bell, Pollyana \(Polly\)](#); ["Brown, Steve"](#); [Davis, Jay](#); [Dotterer III, Gaillard T. \(Gilly\)](#); [Peterson, Susan](#); [Preiser, Skyla](#); [Wakeham, Rebecca \(Becky\)](#); ["avenable@cclawfirm.com"](mailto:avenable@cclawfirm.com); ["jbogle@cclawfirm.com"](mailto:jbogle@cclawfirm.com)
Subject: Solesbee v. Fundamental (Sup. Ct. 23-000777 // Ct. App. 19-001731) - CR 180793 - Petition for a Writ of Certiorari
Date: Monday, June 5, 2023 7:19:00 PM
Attachments: [image002.png](#)
[Solesbee v. Fundamental \(Sup. Ct. Case No. 2023-000777\) -- Cert Petition.pdf](#)

Attached for service in the above-referenced matter please find our **Petition for a Writ of Certiorari**.

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