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**Jun 12 2023**

**SC Court of Appeals**

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

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Appeal from Spartanburg County  
Court of Common Pleas

R. Keith Kelly, Circuit Court Judge

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Cases No. 2019-CP-42-03708 and 2019-CP-42-03709

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Appellate Case No. 2022-001059

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Kenneth Pace,  
Individually and as Personal Representative of  
the Estate of Earl E. Pace,

Respondent,

v.

Lake Emory Post Acute Care; THI of South Carolina at Camp  
Care, LLC; THI of South Carolina, LLC; THI of Baltimore, Inc.;  
Fundamental Administrative Services, LLC; Fundamental  
Clinical and Operational Services, LLC; Fundamental Clinical  
Consulting, LLC; Fundamental Long Term Care Holdings, LLC;  
and Kerry L. Wheeler, DO,

Defendants,

Of which Lake Emory Post Acute Care; THI of South Carolina at  
Camp Care, LLC; THI of South Carolina, LLC; THI of  
Baltimore, Inc.; Fundamental Administrative Services, LLC;  
Fundamental Clinical and Operational Services, LLC; and  
Fundamental Long Term Care Holdings, LLC, are

Appellants.

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**PROOF OF SERVICE**

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I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that the **INITIAL REPLY BRIEF OF APPELLANTS and APPELLANTS' REPLY DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** were served on Respondent and on Defendant Kerry L. Wheeler, DO, on June 12, 2023, by emailing (see attached) a copy of the same to their counsel of record:

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June 12, 2023

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**Subject:** Pace v. Lake Emory (2022-001059) -- Initial Reply Brief of Appellants and Appellants" Reply Designation of Matter  
**Date:** Monday, June 12, 2023 6:29:55 PM  
**Attachments:** [image001.png](#)  
[Pace v. Lake Emory \(Appeal No. 2022-001059\) -- Initial Reply Brief of Appellants w POS.pdf](#)  
[Pace v. Lake Emory \(Appeal No. 2022-001059\) -- Appellants" Reply Designation of Matter.pdf](#)

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Attached for service in the above-referenced matter please find the **Initial Reply Brief of Appellants** and **Appellants' Reply Designation of Matter to be Included in the Record on Appeal**.

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