

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

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Appeal from Spartanburg County  
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

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Case No. 2019-CP-42-03075

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Court of Appeals Case No. 2020-000500  
Unpublished Opinion No. 2023-UP-299 (S.C. Ct. App. filed August 23, 2023)

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Supreme Court Case No. 2023-001815

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Betty Nanney,  
by and through her Attorney-in-Fact, Leslie Nanney,

Respondent,

v.

THI of South Carolina at Spartanburg, LLC,  
d/b/a Magnolia Manor-Spartanburg, Rusty Flathmann,  
Laura Anne Winn, and Olishia Gaffney,

Petitioners.

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**PROOF OF SERVICE**

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CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
Russell G. Hines (SC Bar No. 72100)  
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*Attorneys for Petitioners*

**RECEIVED**

**Dec 14 2023**

**S.C. SUPREME COURT**

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioners, hereby certify that Petitioners' **PETITION FOR A WRIT OF CERTIORARI** was served on Respondent on December 14, 2023, by emailing (see attached) a copy of the same to her counsel of record:

Gary W. Poliakoff, Esquire  
[atty@gpoliakoff.com](mailto:atty@gpoliakoff.com)  
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I also certify that Petitioners' **PETITION FOR A WRIT OF CERTIORARI** and **PROOF OF SERVICE** were filed with the South Carolina Court of Appeals on December 14, 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

December 14, 2023

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Thursday, December 14, 2023 4:59 PM  
**To:** atty@gpoliakoff.com; rmullmanjr@gmail.com; jcalloway@mcgowanhood.com; wharrison@mcgowanhood.com  
**Cc:** Hines, Russell; Justman, Aimee  
**Subject:** Nanney v. THI; Sup. Ct. Case No. 2023-001815; Ct. App. Case No. 2020-000500  
**Attachments:** Nanney v. THI (Sup. Ct. 23-001815; Ct. App. 20-000500) -- Petition for a Writ of Certiorari w POS.pdf; Exhibit A -- Subject Opinion (paginated).pdf

Enclosed please find Petitioners' Petition for a Writ of Certiorari with Exhibit for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell  
Project Assistant  
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Phone:(843)720-5488 | Fax:(843)579-1369



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