

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

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Appeal from Spartanburg County  
Court of Common Pleas

J. Mark Hayes, II, Circuit Court Judge

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Case No. 2018-CP-42-03447  
Court of Appeals Case No. 2020-001107  
Supreme Court Case No. 2023-001605

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Estate of Barbara Owens,  
by and through her Personal Representative, Mary Jane McCraw,  
Individually and on behalf of Statutory Beneficiaries,

**RECEIVED**

**Dec 15 2023**

**S.C. SUPREME COURT**

Respondent,

v.

Fundamental Clinical and Operational Services, LLC;  
Fundamental Administrative Services, LLC;  
THI of South Carolina, LLC;  
THI of South Carolina at Spartanburg, LLC  
d/b/a Magnolia Manor-Spartanburg,

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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(843) 720-5488

*Attorneys for Petitioners*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioners, hereby certify that Petitioners' **REPLY TO RETURN TO PETITION FOR A WRIT OF CERTIORARI** was served on Respondent on December 15, 2023, by emailing (see attached) a copy of the same to her counsel of record:

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

December 15, 2023

**From:** [Hines, Russell](#)  
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**Subject:** Owens v. Fundamental (Sup. Ct. Case No. 2023-001605; Ct. App. Case No. 2020-001107) -- Reply to Return to Petition for a Writ of Certiorari  
**Date:** Friday, December 15, 2023 10:35:42 PM  
**Attachments:** [image001.png](#)  
[Owens v. Fundamental \(2023-001605\) -- Reply to Return to Petition for a Writ of Certiorari.pdf](#)

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Attached for service in the above-referenced matter please find Petitioners' **Reply to Return to Petition for a Writ of Certiorari**.

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