

**RECEIVED**

**Jan 04 2024**

**SC Court of Appeals**

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

---

Appeal from Spartanburg County  
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

---

Case No. 2021-CP-42-03701  
Appellate Case No. 2023-000432

---

The Estate of Jo Eva Rice, deceased,  
by her Personal Representative Sonya Lovett,

Respondent,

v.

Fundamental Clinical and Operational Services, LLC;  
Fundamental Administrative Services, LLC; and  
THI of South Carolina at Magnolia Place–Spartanburg, a/k/a  
Physical Rehab and Wellness of Spartanburg,

Appellants,

---

**PROOF OF SERVICE**

---

CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
James D. Gandy, III (SC Bar No. 11925)  
Russell G. Hines (SC Bar No. 72100)  
T. Ashton Phillips, III (SC Bar No. 104227)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Appellants*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that the **FINAL BRIEF OF APPELLANTS, CERTIFICATION FOR FINAL BRIEF OF APPELLANTS, FINAL REPLY BRIEF OF APPELLANTS**, and **CERTIFICATION FOR FINAL REPLY BRIEF OF APPELLANTS** were served on Respondent on January 4, 2024, by emailing (see attached) a copy of the same to Respondent's counsel of record:

W. Harold Christian, Jr., Esquire  
[hchristian@cclawfirm.com](mailto:hchristian@cclawfirm.com)  
Matthew W. Christian, Esquire  
[mchristian@cclawfirm.com](mailto:mchristian@cclawfirm.com)  
CHRISTIAN & CHRISTIAN, LLC

*-and-*

Jordan C. Calloway, Esquire  
[jcalloway@mcghowanhood.com](mailto:jcalloway@mcghowanhood.com)  
MCGOWAN, HOOD, FELDER & PHILLIPS, LLC  
*Attorneys for Respondent*

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Russell G. Hines (SC Bar No. 72100)  
*Attorneys for Appellants*

Charleston, South Carolina

January 4, 2024

**From:** [Hines, Russell](#)  
**To:** ["Jordan Calloway"; "Harold Christian"; "Matt Christian"; "jcalloway@mcgowanhood.com"](#)  
**Cc:** [Brown, Stephen L.; Davis, Jay; Phillips, Ashton; Gandy, III, James D. \(Tripp\); "jbogle@cclawfirm.com"; "ggoodwin@cclawfirm.com"; Justman, Aimee; Bell, Pollyana \(Polly\)](#)  
**Subject:** Rice v. Fundamental (Appellate Case No. 2023-000432) --Appellants' Final Briefs  
**Date:** Thursday, January 4, 2024 6:41:31 PM  
**Attachments:** [image001.png](#)  
[Rice v. Fundamental \(2023-000432\) -- Final Brief of Appellants.pdf](#)  
[Rice v. Fundamental \(2023-000432\) -- Certification for Final Brief of Appellants.pdf](#)  
[Rice v. Fundamental \(2023-000432\) -- Final Reply Brief of Appellants.pdf](#)  
[Rice v. Fundamental \(2023-000432\) -- Certification for Final Reply Brief of Appellants.pdf](#)

---

Attached for service in the above-referenced case please find the **Final Brief of Appellants** and corresponding **Certification** and the **Final Reply Brief of Appellants** and corresponding **Certification**.

Russell G. Hines  
CLEMENT RIVERS, LLP  
[www.ycrlaw.com](http://www.ycrlaw.com)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
Phone: (843) 720-5488  
Fax: (843) 579-1327  
Email: [rhines@ycrlaw.com](mailto:rhines@ycrlaw.com)



**CLEMENT RIVERS, LLP**  
25 Calhoun Street • Suite 400 • Charleston, SC 29401  
[ycrlaw.com](http://ycrlaw.com)