

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
Matthew W. Christian, Esquire
mchristian@cclawfirm.com
CHRISTIAN & CHRISTIAN, LLC

-and-

Jordan C. Calloway, Esquire
jcallloway@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. \(Tripp\); "ibogle@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
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



CLEMENT RIVERS, LLP
25 Calhoun Street • Suite 400 • Charleston, SC 29401
ycrlaw.com