

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

Appeal from Spartanburg County
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

Case No. 2019-CP-42-03075

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Unpublished Opinion No. 2023-UP-299 (S.C. Ct.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

Supreme Court Case No. 2023-001815

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.

PROOF OF SERVICE

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Jan 23 2024

S.C. SUPREME COURT

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 January 22, 2024, by emailing (see attached) a copy of the same to her counsel of record:

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Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
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January 22, 2024

From: [Hines, Russell](#)
To: [Jordan Calloway](#); [Ray Mullman](#); [Boss Poliakoff](#); [Whitney Harrison](#); jcalloway@mcgowanhood.com
Cc: [Dotterer III, Gaillard T. \(Gilly\)](#); [Davis, Jay](#); [Brown, Stephen L.](#); [Justman, Aimee](#); [Bell, Pollyana \(Polly\)](#); [Wakeham, Rebecca \(Becky\)](#); [Preiser, Skyla](#); [Peterson, Susan](#)
Subject: Nanney v. THI of S.C. at Spartanburg (Sup. Ct. Case No. 2023-001815) -- Reply to Return to Petition for a Writ of Certiorari
Date: Monday, January 22, 2024 11:56:07 PM
Attachments: [image001.png](#)
[Nanney v. THI \(Sup. Ct. 23-001815\) -- Reply to Return to Petition for a Writ of Certiorari.pdf](#)

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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