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**Feb 28 2024**

**SC Court of Appeals**

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

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Appeal from Spartanburg County  
Court of Common Pleas  
Grace Gilchrist Knie, Circuit Court Judge

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Case No. 2022-CP-42-01163  
Appellate Case No. 2023-001612

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Timothy Hutley, Guardian for Jane Doe,

Respondent,

v.

THI of South Carolina at Magnolia Manor Inman, LLC,  
THI of Baltimore, Inc., THI of South Carolina, LLC,  
Hunt Valley Holdings, LLC, THI of South Carolina at Inman, LLC,  
Murray Forman, and Kathy Scroggs, Individually,

Defendants.

Of which THI of South Carolina at Magnolia Manor Inman, LLC,  
THI of Baltimore, Inc., THI of South Carolina, LLC, and  
Hunt Valley Holdings, LLC, are the

Appellants.

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**PROOF OF SERVICE**

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I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that the **INITIAL BRIEF OF APPELLANTS and APPELLANTS' DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** were served on Respondent on February 28, 2024, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

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Respectfully submitted,  
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By: s/Russell G. Hines  
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Charleston, South Carolina

February 28, 2024

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**Subject:** Hutley v. THI; Appellate Case No. 2023-001612 (CR 210889) -- Initial Brief of Appellants  
**Date:** Wednesday, February 28, 2024 11:53:34 PM  
**Attachments:** [image002.png](#)  
[Hutley v. THI \(2023-001612\) -- Initial Brief of Appellants.pdf](#)  
[Hutley v. THI \(2023-001612\) -- Appellants' Designation.pdf](#)

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Attached for service please find the **Initial Brief of Appellants** and **Appellants' Designation of Matter to be Included in the Record on Appeal**.

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