

THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Mar 05 2024

Appeal from Spartanburg County  
Court of Common Pleas

S.C. SUPREME COURT

Grace Gilchrist Knie, Circuit Court Judge

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Case No. 2020-CP-42-03593  
Unpublished Opinion No. 2023-UP-392 (S.C. Ct. App. filed Dec. 5, 2023)

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Trina Dawkins,  
as Personal Representative of the Estate of William Dawkins,

Respondent,

v.

Fundamental Clinical and Operational Services, LLC;  
Fundamental Administrative Services, LLC;  
THI of South Carolina, LLC;  
THI of South Carolina at Spartanburg, LLC;  
THI of South Carolina at Magnolia Manor-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)  
James D. Gandy, III (SC Bar No. 11925)  
Russell G. Hines (SC Bar No. 72100)  
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*Attorneys for Petitioners*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioners, hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI** was served on Respondent on March 5, 2024, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

William A. Jordan III, Esquire  
[william@jordanlawcenter.com](mailto:william@jordanlawcenter.com)  
JORDAN LAW CENTER, LLC  
622 Wade Hampton Boulevard  
Greenville, SC 29609

*Attorney for Respondent*

I also certify that Petitioners' **MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI** and **PROOF OF SERVICE** were filed with the South Carolina Court of Appeals on March 5, 2024, via email (see attached) 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

March 5, 2024

**From:** [Bell, Pollyana \(Polly\)](#)  
**To:** [william@jordanlawcenter.com](mailto:william@jordanlawcenter.com)  
**Cc:** [Hines, Russell](#); [Justman, Aimee](#)  
**Subject:** Dawkins v. Fundamental Clinical; Appellate Case No. 2021-000707 (CR 200461)  
**Date:** Tuesday, March 5, 2024 3:37:53 PM  
**Attachments:** [image001.png](#)  
[Mot. for Ext. -Petition for Writ of Cert -Dawkins.pdf](#)

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Enclosed please find Petitioners' Motion for Extension of Time to Serve/File Petition for Writ of Certiorari for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell  
Project Assistant  
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