

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

Appeal from Dorchester County
Court of Common Pleas

Robert Bonds, Circuit Court Judge
R. Markley Dennis Jr., Circuit Court Judge

Case No. 2021-CP-18-01030
Court of Appeals Case No. 2022-001807
Unpublished Opinion No. 2023-UP-394 (S.C. Ct. App. filed December 13, 2023)
Supreme Court Case No. 2024-000302

Tammy China,
as Personal Representative of the
Estate of Emma Lee James,

Respondent,

v.

Palmetto Hallmark Operating, LLC
d/b/a Hallmark Healthcare Center, and
Elite Patient Care of South Carolina, PC,

Defendants,

Of which Palmetto Hallmark Operating, LLC
d/b/a Hallmark Healthcare Center is

Petitioner.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
Matthew O. Riddle (SC Bar No. 76650)
Kara S. Grevey (SC Bar No. 101742)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Petitioner

RECEIVED

Mar 28 2024

S.C. SUPREME COURT

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioner, hereby certify that Petitioner's **PETITION FOR A WRIT OF CERTIORARI** was served on Respondent and Defendant Elite Patient Care of South Carolina, PC, on March 28, 2024, by emailing (see attached email) a copy of the same to their counsel of record:

Mario A. Pacella, Esquire
mpacella@stromlaw.com
Jessica L. Fickling, Esquire
jfickling@stromlaw.com
Amy E. Willbanks, Esquire
awillbanks@stromlaw.com
Matthew B. Robins, Esquire
mrobins@stromlaw.com
STROM LAW FIRM, LLC

Attorneys for Respondent

Joseph J. Tierney, Jr., Esquire
joseph.tierney@rogerstownsendsend.com
Hunter A. Morgan, Esquire
hunter.morgan@rogerstownsendsend.com
ROGERS TOWNSEND, LLC

*Attorneys for Defendant
Elite Patient Care of South Carolina, PC*

I also certify that Petitioners' **PETITION FOR A WRIT OF CERTIORARI** and **PROOF OF SERVICE** were filed with the South Carolina Court of Appeals on March 28, 2024, via email to ctappfilings@sccourts.org.

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines (SC Bar No. 72100)

Attorneys for Petitioner

Charleston, South Carolina

March 28, 2024

From: [Hines, Russell](#)
To: [Mario Pacella](#); [Jessica Fickling](#); [Amy Willbanks](#); [Matt Robins](#); [Joseph Tierney, Jr](#); [Hunter A. Morgan](#)
Cc: [Brown, Stephen L.](#); [Davis, Jay](#); [Riddle, Matthew](#); [Grevey, Kara S.](#); [Justman, Aimee](#); [Bell, Pollyana \(Polly\)](#); [Peterson, Susan](#); [Preiser, Skyla](#); [Wakeham, Rebecca \(Becky\)](#)
Subject: China v. Palmetto (Sup. Ct. 24-302; Ct. App. 22-1807) -- Petition for a Writ of Certiorari
Date: Thursday, March 28, 2024 8:56:19 PM
Attachments: [image001.png](#)
[China v. Palmetto \(Sup. Ct. 24-302; Ct. App. 22-1807\) -- Cert Petition.pdf](#)

Attached for service in the above-referenced matter please find our **Petition for a Writ of Certiorari**.

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