

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

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**RECEIVED**

**Mar 28 2024**

**S.C. SUPREME COURT**

Appeal from Spartanburg County  
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

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Case No. 2020-CP-42-03593

Court of Appeals Case No. 2021-000707

Unpublished Opinion No. 2023-UP-392 (S.C. Ct. App. filed December 13, 2023)

Supreme Court Case No. 2024-000304

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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)  
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 Petitioners*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioners, hereby certify that Petitioners' **PETITION FOR A WRIT OF CERTIORARI** was served on Respondent on March 28, 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' **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](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 28, 2024

**From:** [Hines, Russell](#)  
**To:** [william@jordanlawcenter.com](mailto:william@jordanlawcenter.com)  
**Cc:** [Brown, Stephen L.](#); [Davis, Jay](#); [Justman, Aimee](#); [Bell, Pollyana \(Polly\)](#); [Peterson, Susan](#); [Preiser, Skyla](#); [Wakeham, Rebecca \(Becky\)](#); [Gandy, III, James D. \(Tripp\)](#); [Phillips, Ashton](#)  
**Subject:** Dawkins v. Fundamental (Sup. Ct. 24-304; Ct. App. 21-707) -- Petition for a Writ of Certiorari  
**Date:** Thursday, March 28, 2024 9:03:39 PM  
**Attachments:** [image001.png](#)  
[Dawkins v. Fundamental \(Sup. Ct. 24-304; Ct. App. 21-707\) -- Cert Petition.pdf](#)

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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](http://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](mailto:rhines@ycrlaw.com)



**CLEMENT RIVERS, LLP**

25 Calhoun Street • Suite 400 • Charleston, SC 29401  
[ycrlaw.com](http://ycrlaw.com)