

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

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Mar 28 2024

S.C. SUPREME COURT

Appeal from Georgetown County
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

Case No. 2019-CP-22-00961
Court of Appeals Case No. 2020-001167
Unpublished Opinion No. 2023-UP-396 (S.C. Ct. App. filed December 13, 2023)
Supreme Court Case No. 2024-000305

Kevin Greene,
as Attorney in Fact for and on Behalf of
Eleanor Greene Wragg,

Respondent,

v.

Palmetto Prince George Operating, LLC
d/b/a Prince George Healthcare Center;
Palmetto Health Care, LLC;
Murray Forman, Individually; and
Richard Porter, Individually,

Defendants.

Of whom Palmetto Prince George Operating, LLC
d/b/a Prince George Healthcare Center;
Palmetto Health Care, LLC; and
Richard Porter, Individually, are

Petitioners.

AMENDED PROOF OF SERVICE

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
Russell G. Hines (SC Bar No. 72100)
Matthew O Riddle (SC Bar No. 76650)
Gaillard T. Dotterer, III (SC Bar No. 103620)
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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:

Dirk J. Derrick, Esquire
dirk.derrick@derricklawfirm.com
S. Taylor Hooven, Esquire
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The Derrick Law Firm
Attorneys for Respondent

I also certify that Petitioners' **PETITION FOR A WRIT OF CERTIORARI** and **AMENDED 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 Petitioners

Charleston, South Carolina

March 28, 2024

From: [Hines, Russell](#)
To: dirk.derrick@derricklawfirm.com; taylor.hooven@derricklawfirm.com
Cc: [Brown, Stephen L.](#); [Davis, Jay](#); [Riddle, Matthew](#); [Grevey, Kara S.](#); [Justman, Aimee](#); [Bell, Pollyana \(Polly\)](#); [Peterson, Susan](#); [Preiser, Skyla](#); [Wakeham, Rebecca \(Becky\)](#); [Dotterer III, Gaillard T. \(Gilly\)](#)
Subject: RE: Greene v. Palmetto (Sup. Ct. 24-305; Ct. App. 20-1167) -- Petition for a Writ of Certiorari
Date: Thursday, March 28, 2024 9:42:10 PM
Attachments: [image001.png](#)
[Greene v. Palmetto \(Sup. Ct. 24-305; Ct. App. 20-1167\) -- Cert Petition.pdf](#)

Please pardon the second email, but attached for service in the above-referenced matter please find our **Petition for a Writ of Certiorari**.

I mistyped Dirk's email on the email below.

Russell G. Hines
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From: Hines, Russell
Sent: Thursday, March 28, 2024 9:09 PM
To: dirk.derrick@derricklawfir.com; taylor.hooven@derricklawfirm.com
Cc: [Brown, Stephen L. <sbrown@ycrlaw.com>](mailto:sbrown@ycrlaw.com); [Davis, Jay <jdavis@ycrlaw.com>](mailto:jdavis@ycrlaw.com); [Riddle, Matthew <MRiddle@ycrlaw.com>](mailto:MRiddle@ycrlaw.com); [Grevey, Kara S. <kgrevey@ycrlaw.com>](mailto:kgrevey@ycrlaw.com); [Justman, Aimee <AJustman@ycrlaw.com>](mailto:AJustman@ycrlaw.com); [Bell, Pollyana \(Polly\) <pbell@ycrlaw.com>](mailto:pbell@ycrlaw.com); [Peterson, Susan <speterson@ycrlaw.com>](mailto:speterson@ycrlaw.com); [Preiser, Skyla <spreiser@ycrlaw.com>](mailto:spreiser@ycrlaw.com); [Wakeham, Rebecca \(Becky\) <bwakeham@ycrlaw.com>](mailto:bwakeham@ycrlaw.com); [Dotterer III, Gaillard T. \(Gilly\) <gdotterer@ycrlaw.com>](mailto:gdotterer@ycrlaw.com)
Subject: Greene v. Palmetto (Sup. Ct. 24-305; Ct. App. 20-1167) -- Petition for a Writ of Certiorari

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

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