

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

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May 09 2024

S.C. SUPREME COURT

Appeal from Florence County
Court of Common Pleas

William H. Seals Jr., Circuit Court Judge

Case No. 2020-CP-21-02290
Court of Appeals Case No. 2021-000586
Unpublished Opinion No. 2024-UP-005 (S.C. Ct. App. filed January 3, 2024)
Supreme Court Case No. 2024-000615

Mary Tisdale,
as Personal Representative of the Estate of Earlene Seabrook,

Respondent,

v.

Palmetto Lake City Operating, LLC
d/b/a Lake City-Scranton Healthcare Center
and Jeffrey Gibbs,

Defendants,

Of whom Palmetto Lake City Operating, LLC
d/b/a Lake City-Scranton Healthcare Center is the

Petitioner.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis Jr. (SC Bar No. 12084)
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Attorneys for Petitioner

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 on May 9, 2024, by emailing (see attached) a copy of the same to Respondent's counsel of record:

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-and-

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Attorneys for Respondent

I also certify that Petitioner's **PETITION FOR A WRIT OF CERTIORARI** and **PROOF OF SERVICE** were filed with the South Carolina Court of Appeals on May 9, 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

May 9, 2024

From: [Hines, Russell](#)
To: nate@hugheyfirm.com; stuart@hugheyfirm.com; [Brad Banyas](#); icalloway@mcgowanhood.com; jordan@mcgowanhood.com
Cc: [Brown, Stephen L.](#); [Davis, Jay](#); [Riddle, Matthew](#); [Justman, Aimee](#); [Bell, Pollyana \(Polly\)](#); [Peterson, Susan](#); [Preiser, Skyla](#); [Wakeham, Rebecca \(Becky\)](#)
Subject: Tisdale v. Palmetto Lake City (Sup. Ct. 24-615; Ct. App. 21-586) -- Petition for a Writ of Certiorari
Date: Thursday, May 9, 2024 5:46:10 PM
Attachments: [image001.png](#)
[Tisdale v. Palmetto Lake City \(Sup. Ct. 24-615; Ct. App. 21-586\) -- Petition for a Writ of Certiorari.pdf](#)

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

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