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Jul 22 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Spartanburg County
Court of Common Pleas
Grace Gilchrist Knie, Circuit Court Judge

Case No. 2022-CP-42-01163
Appellate Case No. 2023-001612

Timothy Hutley, Guardian for Jane Doe,

Respondent,

v.

THI of South Carolina at Magnolia Manor Inman, LLC,
THI of Baltimore, Inc., THI of South Carolina, LLC,
Hunt Valley Holdings, LLC, THI of South Carolina at Inman, LLC,
Murray Forman, and Kathy Scroggs, Individually,

Defendants.

Of which THI of South Carolina at Magnolia Manor Inman, LLC,
THI of Baltimore, Inc., THI of South Carolina, LLC, and
Hunt Valley Holdings, LLC, are the

Appellants.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
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Attorneys for Appellants

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that the **RECORD ON APPEAL** was served on Respondent on July 22, 2024, by emailing (see email) a copy of the same to Respondent's counsel of record:

C. Daniel Pruitt, Esquire
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Attorney for Respondent

Respectfully submitted,
CLEMENT RIVERS, LLP

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

Charleston, South Carolina

July 22, 2024

From: [Bell, Pollyana \(Polly\)](#)
To: ["danlaw@bellsouth.net"](mailto:danlaw@bellsouth.net); ["Dan Pruitt"](#)
Cc: [Hines, Russell](#); [Justman, Aimee](#)
Subject: Hutley v. THI; Appellate Case No. 2023-001612 (CR 210889)
Date: Monday, July 22, 2024 2:02:35 PM
Attachments: [ROA.pdf](#)
[image001.png](#)

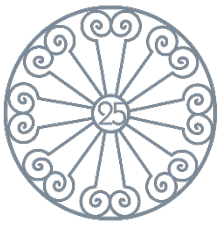
Enclosed please find the Record on Appeal for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell
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July 22, 2024

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: Timothy Hutley, Guardian for Jane Doe v. THI of South Carolina at Magnolia Manor Inman, LLC, THI of Baltimore, Inc., THI of South Carolina, LLC, Hunt Valley Holdings, LLC, THI of South Carolina at Inman, LLC, Murray Forman, and Kathy Scroggs, Individually
Appeal Case No.: 2023-001612
Underlying Case No.: 2022-CP-42-01163
YCR File: 14347-20210889

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter, please find the Record on Appeal and proof of service, a paper copy of which will be sent by US Mail to your street address.

Although we (Appellants) ultimately opted against submitting a reply brief, we originally anticipated filing one and sought two extensions of time to do so, the last of which ran to July 1, 2024. Accordingly, we calculated the due date for the Record on Appeal to be twenty (20) days thereafter, which is today, July 22, 2024, pursuant to Rule 263(a), SCACR.

With best wishes and kindest regards, I am

Sincerely,

CLEMENT RIVERS, LLP

/Russell G. Hines

Russell G. Hines
Partner

RGH/amj

cc: C. Daniel Pruitt, Esquire, Dan Pruitt Law Firm