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Oct 17 2024

S.C. SUPREME COURT

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

Appeal from Spartanburg County
Court of Common Pleas

R. Keith Kelly, Circuit Court Judge

Court of Appeals Case No. 2022-001059
Circuit Court Cases No. 2019-CP-42-03708 and -03709
Unpublished Opinion No. 2024-UP-261 (S.C. Ct. App. filed July 17, 2024)

Kenneth Pace,
Individually and as Personal Representative of
the Estate of Earl E. Pace,

Respondent,

v.

Lake Emory Post Acute Care; THI of South Carolina at Camp Care,
LLC; THI of South Carolina, LLC; THI of Baltimore, Inc.; Fundamental
Administrative Services, LLC; Fundamental Clinical and Operational
Services, LLC; Fundamental Clinical Consulting, LLC; Fundamental
Long Term Care Holdings, LLC; and Kerry L. Wheeler, DO,

Defendants,

Of which Lake Emory Post Acute Care; THI of South Carolina at Camp
Care, LLC; THI of South Carolina, LLC; THI of Baltimore, Inc.;
Fundamental Administrative Services, LLC; Fundamental Clinical and
Operational Services, LLC; and Fundamental Long Term Care
Holdings, LLC, are

Petitioners.

PROOF OF SERVICE

**Counsel identified on next page*

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Attorneys for Petitioners

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioners, hereby certify that Petitioners' **MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI** was served on Respondent on October 17, 2024, by emailing (see attached) a copy of the same to Respondent's counsel of record:

Jennifer Spragins Burnett, Esquire
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I also certify that Petitioners' **MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI** and **PROOF OF SERVICE** was filed with the South Carolina Court of Appeals on October 17, 2024, via email (see attached) 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

October 17, 2024

From: [Bell, Pollyana \(Polly\)](#)
To: jennifer@harbinlaw.com; aharbin@harbinlaw.com; skellner@harbinlaw.com
Cc: [Justman, Aimee](#); [Hines, Russell](#)
Subject: Pace v. Lake Emory; Ct. App. Case No. 2022-001059 (CR 190600)
Date: Thursday, October 17, 2024 2:10:16 PM
Attachments: [Motion for Extension - Petition for Writ of Cert .pdf](#)
[image001.png](#)

Enclosed please find Petitioners' Motion for Extension of Time to Serve/File their Petition for Writ of Certiorari for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell
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