

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

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Mar 24 2025

S.C. SUPREME COURT

Appeal from Spartanburg County
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

Case No. 2022-CP-42-01163

Court of Appeals Case No. 2023-001612

Unpublished Opinion No. 2024-UP-399 (S.C. Ct. App. filed November 27, 2024)

Supreme Court Case No. Case No. 2025-000398

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

Petitioners.

PROOF OF SERVICE

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)
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Attorneys for Petitioners

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioners, certify that Petitioners' **PETITION FOR A WRIT OF CERTIORARI** was served on Respondent on March 24, 2025, by emailing (see attached email) a copy of the same to his counsel of record:

C. Daniel Pruitt, Esquire
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Greenville, SC 29601

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 24, 2025, 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 24, 2025

From: [Hines, Russell](#)
To: [Dan Pruitt](#); [Dan Pruitt](#)
Cc: [Brown, Stephen L.](#); [Davis, Jay](#); [Gandy, III, James D. \(Tripp\)](#); [Bell, Pollyana \(Polly\)](#); [Justman, Aimee](#); [Peterson, Susan](#); [Eversole, Amy R.](#); [Wakeham, Rebecca \(Becky\)](#)
Subject: Hutley v. THI (Sup. Ct. 25-000398; Ct. App. 23-001612) -- Petition for a Writ of Certiorari
Date: Monday, March 24, 2025 6:51:00 PM
Attachments: [Hutley v. THI \(Sup. Ct. 25-000398; Ct. App. 23-001612\) -- Petition for a Writ of Certiorari.pdf](#)
[image001.png](#)

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

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