

RECEIVED

Apr 28 2025

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

J. Mark Hayes, II, Circuit Court Judge

Case No. 2017-CP-42-00219  
Appellate Case No. 2025-000346

Jo Ann Blackwell, Michelene Brooks, and Samuel H. Owens,  
Jr., individually and on behalf of all others similarly situated,..... Respondents,

v.

Mary Black Health System, LLC, d/b/a Mary Black Memorial  
Hospital; CHSPSC, LLC; Professional Account Services, Inc ..... Petitioners.

**PROOF OF SERVICE**

The undersigned hereby certifies that on April 28, 2025, a copy of **Petitioners' Reply to Return in Opposition to Petition for a Writ of Certiorari** was served on all counsel of record via email containing the above referenced document to counsels' individual AIS email addresses as follows:

John B. White, Jr. (S.C. Bar No. 5996)  
Marghretta H. Shisko (S.C. Bar No. 100106)  
Griffin L. Lynch (S.C. Bar No. 72518)  
John B. White, Jr. P.A.  
291 S. Pine Street  
P.O. Box 2465 (29304)  
Spartanburg, SC 29302  
[jwhite@johnbwhitelaw.com](mailto:jwhite@johnbwhitelaw.com)  
[mshisko@johnbwhitelaw.com](mailto:mshisko@johnbwhitelaw.com)  
[glynch@johnbwhitelaw.com](mailto:glynch@johnbwhitelaw.com)

John S. Simmons (S.C. Bar No. 10260)  
Rachel G. Peavy (S.C. Bar No. 69397)  
Simmons Law Firm, LLC  
1711 Pickens Street  
Columbia, SC 29201  
(803) 779-4600  
[jsimmons@simmonsfirm.com](mailto:jsimmons@simmonsfirm.com)  
[rpeavy@simmonsfirm.com](mailto:rpeavy@simmonsfirm.com)

*Attorneys for Respondents Jo Ann  
Blackwell, Michelene Brooks, and Samuel  
H. Owens, Jr.*

s/James Lynn Werner  
James Lynn Werner, S.C. Bar No. 6029  
Katon E. Dawson, Jr., SC Bar No. 101167  
PARKER POE ADAMS & BERNSTEIN LLP  
1221 Main Street, Suite 1100  
Post Office Box 1509 (29202)  
Columbia, South Carolina 29201  
Telephone: (803) 255-8000  
Facsimile: (803) 255-8017  
[jimwerner@parkerpoe.com](mailto:jimwerner@parkerpoe.com)  
[katondawson@parkerpoe.com](mailto:katondawson@parkerpoe.com)

*Attorneys for Petitioners, Mary Black Health  
System, LLC, d/b/a Mary Black Memorial Hospital;  
CHSPSC, LLC; Professional Account Services, Inc.*

April 28, 2025  
Columbia, South Carolina