

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

Appeal from Charleston County
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

Appellate Case No. 2025-000286

RECEIVED
May 15 2025
SC Court of Appeals

William Haynes as Personal Representative of the Estate of Elizabeth Varner,

Respondent,

v.

Fundamental Services LLC, Fundamental Clinical and Operational Services LLC, and Jerrolyn
Montgomery-Small,

Appellants.

PROOF OF SERVICE

PINKSTON LAW FIRM, LLC
Shawn Pinkston, SC Bar No. 79965
856 Lowcountry Blvd., Suite 101
Mount Pleasant, South Carolina 29464
Office: 843-814-5472


Attorney for Respondent

I, Shawn Pinkston, of the Pinkston Law Firm, LLC, attorney for Appellant, hereby certify that I have served **Respondent's Reply to Appellants' Return to Respondent's Motion to Dismiss** was served on all parties by electronic mail (see attached emails) a copy of the same to Appellants' Counsel of Record:

Russell G. Hines
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
Matthew O. Riddle (SC Bar No. 76650)
Russell G. Hines (SC Bar No. 72100)
Young Clement Rivers LLP
25 Calhoun Street – Suite 400
Charleston, S.C. 29401

Attorneys for Appellants

Mount Pleasant, South Carolina
May 15, 2025

From: Shawn Pinkston shawnpinkston@me.com 
Subject: Re: Haynes v. Fundamental (2025-000286) -- Respondent's Reply to Appellants' Return to Respondent's Motion to Dismiss
Date: May 15, 2025 at 11:15 AM
To: Hines, Russell RHines@yclr.com, Brown, Stephen L. sbrown@yclr.com, Davis, Jay jdavis@yclr.com, Riddle, Matthew MRiddle@yclr.com
Cc: Justman, Aimee AJustman@yclr.com, Bell, Pollyana (Polly) pbell@yclr.com, Peterson, Susan speterson@yclr.com, Bohannon, Kiara kbohannon@yclr.com, Eadie, Christine ceadie@yclr.com



Russ,

See attached Reply to Appellants' Return to Motion to Dismiss Notice of Appeal . Thanks.

Resp Reply to App. Return MTD
Notice of Appeal .pdf



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On May 2, 2025, at 12:46 PM, Shawn Pinkston <shawnpinkston@me.com> wrote:

Russ,

See attached Respondent's Return to Appellants' Second Request for Extension of Time to File/Serve Return to Respondent's Motion to Dismiss, which is being filed with the Court of Appeals. Thank you.

<Resp Return to 2d Req for Ext of Time.pdf>

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