

104960  
**RECEIVED**

**Jun 09 2025**

**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

**RECEIVED**

**JUN 13 2025**

**SC Court of Appeals**

Appellate Case No. 2023-001371

Steven McCarson, as Personal Representative of the Estate of  
Louie Arches.....Respondent,

v.

THI of South Carolina at Magnolia Manor-Inman, LLC  
d/b/a Magnolia Manor-Inman, THI of South Carolina at Inman, LLC,  
THI of South Carolina, LLC, Hunt Valley Holdings, LLC,  
Fundamental Administrative Services, LLC,  
Fundamental Clinical and Operational Services, LLC,  
THI of Baltimore, LLC, and James H. Mack.....Appellants.

**RESPONDENT'S MOTION FOR COSTS**

Pursuant to Rules 222 and 240 of the South Carolina Appellate Court Rules, Respondent respectfully moves for an order granting the award of attorney's fees against Appellants in the amount of \$2,500.00. The order of this Court affirmed the Circuit Court on September 25, 2024, the Supreme Court of South Carolina denied certiorari on June 3, 2025, and the remittitur was issued on June 4, 2025. Included in support of this motion is an itemized statement of costs in this action allowable under the Rules and sworn to by John E. Parker, Jr., attorney for Respondent.

Respectfully submitted,

By:     s/John E. Parker, Jr.    

Lee D. Cope  
John E. Parker, Jr  
PARKER LAW GROUP, LLP  
101 Mulberry Street East  
Post Office Box 487  
Hampton, South Carolina, 29924  
(803) 903-1781  
lcope@parkerlawgroupsc.com  
jayparker@parkerlawgroupsc.com

AND

KOON, COOK & WALTERS, LLC  
Jamie Walters  
2016 Gadsden St.  
Columbia, SC 29201

ATTORNEYS FOR RESPONDENT

June 9, 2025  
Hampton, South Carolina

RECEIVED

Jun 09 2025

SC Court of Appeals

RECEIVED

JUN 13 2025

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

Appellate Case No. 2023-001371

Steven McCarson, as Personal Representative of the Estate of  
Louie Arches.....Respondent,

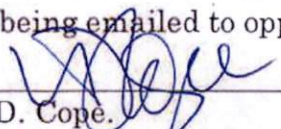
v.

THI of South Carolina at Magnolia Manor-Inman, LLC  
d/b/a Magnolia Manor-Inman, THI of South Carolina at Inman, LLC,  
THI of South Carolina, LLC, Hunt Valley Holdings, LLC,  
Fundamental Administrative Services, LLC,  
Fundamental Clinical and Operational Services, LLC,  
THI of Baltimore, LLC, and James H. Mack.....Appellants.

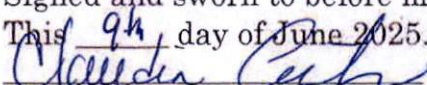
AFFIDAVIT OF COSTS

Attorney's Fee	\$2,500.00
----------------	------------

I, Lee D. Cope, affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement is being emailed to opposing counsel.

  
\_\_\_\_\_  
Lee D. Cope.  
Attorney for Respondent

Signed and sworn to before me  
This 9<sup>th</sup> day of June 2025.

  
Notary Public for South Carolina  
My Commission expires: 3/11/2029



THE STATE OF SOUTH CAROLINA  
In the Supreme Court

---

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

---

Supreme Court Case No. 2025-000090

---

Steven McCarson, as Personal Representative of the Estate of  
Louie Arches.....Respondent,

v.

THI of South Carolina at Magnolia Manor-Inman, LLC  
d/b/a Magnolia Manor-Inman, THI of South Carolina at Inman, LLC,  
THI of South Carolina, LLC, Hunt Valley Holdings, LLC,  
Fundamental Administrative Services, LLC,  
Fundamental Clinical and Operational Services, LLC,  
THI of Baltimore, LLC, and James H. Mack.....Appellants.

---

**PROOF OF SERVICE**

---

The undersigned certifies that a copy of the **Respondent's Motion for Cost**  
has been served upon the following counsel of record by emailing a copy of the same  
this 9<sup>th</sup> day of June 2025.

CLEMENT RIVERS, LLP  
Stephen L. Brown, Esq.  
sbrown@ycrlaw.com  
D. Jay Davis, Jr., Esq.  
jdavis@ycrlaw.com  
James D. Gandy, III, Esq.  
tgandy@ycrlaw.com  
Gaillard T. Dotterer, III, Esq.

RECEIVED

Jun 09 2025

SC Court of Appeals

RECEIVED

JUN 13 2025

SC Court of Appeals

gdotterer@ycrlaw.com  
Russell G. Hines, Esq.  
rhines@ycrlaw.com  
25 Calhoun Street, Suite 400  
P.O. Box 993 (29402)  
Charleston, South Carolina 29401

ATTORNEYS FOR APPELLANTS

By: s/John E. Parker, Jr.

Lee D. Cope  
John E. Parker, Jr  
PARKER LAW GROUP, LLP  
101 Mulberry Street East  
Post Office Box 487  
Hampton, South Carolina, 29924  
(803) 903-1781

AND

KOON, COOK & WALTERS, LLC  
Jamie Walters  
2016 Gadsden St.  
Columbia, SC 29201

ATTORNEYS FOR RESPONDENT

June 10, 2025

The Honorable Jenny Abbott Kitchings  
S.C. Court of Appeals Clerk of Court  
Post Office Box 11629  
Columbia, SC 29211-1629

RECEIVED

JUN 13 2025

SC Court of Appeals

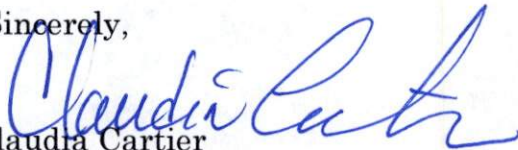
*Re: McCarson v. THI, et al*  
*Appellate Case No.: 2023-001371*

Dear Ms. Kitchings:

Please find enclosed our firm's check in the amount of \$50.00 the filing fee for the Motion for Cost filed June 9, 2025, in regard to the above reference matter.

With kind regards, I am

Sincerely,

  
Claudia Cartier  
Paralegal to John E. Parker

/cc  
Enclosures as stated.

**PARKER**  
LAW GROUP

101 Mulberry Street East  
Post Office Box 487  
Hampton, SC 29924

FIRST-CLASS



US POSTAGE<sup>TM</sup> PITNEY BOWES



ZIP 29924 \$ 000.97<sup>0</sup>  
02 7W  
0008029860 JUN 10 2025

**RECEIVED**

JUN 13 2025

SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
S.C. Court of Appeals Clerk of Court  
Post Office Box 11629  
Columbia, SC 29211-1629

29211/1739/C113

