

RECEIVED

Jul 16 2025

SC Court of Appeals

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

Appeal from Dorchester County
Court of Common Pleas

Maite Murphy, Circuit Court Judge

Case No. 2023-CP-18-00758
Appellate Case No. 2025-000275

James Graham,
as Personal Representative of the Estate of Phyllis Chestnut,

Respondent,

v.

Hallmark Long Term Care, LLC d/b/a Hallmark Healthcare Center,
Fundamental Long Term Care, Inc., THI of South Carolina, LLC, THI of Baltimore, Inc.,
Hunt Valley Holdings, LLC, Fundamental Administrative Services, LLC,
Fundamental Clinical and Operational Services, LLC, Fundamental Clinical Consulting, LLC,
and Curana Health of South Carolina, P.C. f/k/a Elite Patient Care of South Carolina, PC,

Defendants,

Of which Hallmark Long Term Care, LLC d/b/a Hallmark Healthcare Center,
THI of South Carolina, LLC, THI of Baltimore, Inc., Hunt Valley Holdings, LLC,
Fundamental Administrative Services, LLC, Fundamental Clinical and Operational Services,
LLC, and Fundamental Clinical Consulting, LLC, are the

Appellants.

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)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Appellants

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that the **INITIAL BRIEF OF APPELLANTS** and **APPELLANTS' DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** were served on Respondent, as well as Defendant Curana Health of South Carolina, PC f/k/a Elite Patient Care of South Carolina, PC, on July 16, 2025, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

Lee D. Cope, Esquire
lcope@parkerlawgroupsc.com
John E. Parker, Jr., Esquire
jayparker@parkerlawgroupsc.com
PARKER LAW GROUP, LLP

-and-

Steven E. Goldberg (SC Bar No. 66446)
sgoldberg@steinberglawfirm.com

Attorneys for Respondent

Lee C. Weatherly, Esquire
lweatherly@csvl.law
Kristen K. Thompson, Esquire
kthompson@csvl.law
COPELAND, STAIR, VALZ & LOVELL, LLP

*Attorneys for Defendant
Curana Health of South Carolina, PC
f/k/a Elite Patient Care of South Carolina, PC*

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines (SC Bar No. 72100)
Attorneys for Appellants

Charleston, South Carolina

July 16, 2025

Hines, Russell

From: Hines, Russell
Sent: Wednesday, July 16, 2025 7:52 PM
To: Lee Cope; Jay Parker; Steven Goldberg; Weatherly, Lee C.; Thompson, Kristen K.
Cc: Shanna Jarrell; Brown, Stephen L.; Davis, Jay; Gandy, III, James D. (Tripp); Justman, Aimee; Bell, Pollyana (Polly); Peterson, Susan; Wakeham, Rebecca (Becky)
Subject: Graham v. Hallmark (2025-000275) -- Initial Brief of Appellants and Appellants' Designation of Matter
Attachments: Graham v. Hallmark (2025-000275) -- Initial Brief of Appellants.pdf; Graham v. Hallmark (2025-000275) -- Appellants' Designation of Matter.pdf

Attached for service in the above-referenced matter please find the **Initial Brief of Appellants and Appellants' Designation of Matter to be Included in the Record on Appeal.**

Russell G. Hines
CLEMENT RIVERS, LLP
www.ycrlaw.com
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
Phone: (843) 720-5488
Fax: (843) 579-1327
Email: rhines@ycrlaw.com



CLEMENT RIVERS, LLP
25 Calhoun Street • Suite 400 • Charleston, SC 29401
ycrlaw.com