

RECEIVED

Nov 03 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 REPLY BRIEF OF APPELLANTS** and **APPELLANTS' MOTION FOR LEAVE TO FILE/SERVE INITIAL REPLY BRIEF OUT OF TIME** 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 November 3, 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

November 3, 2025

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Monday, November 3, 2025 5:14 PM
To: 'sgoldberg@steinberglawfirm.com'; 'Becky Chapin'; 'Lee Cope'; 'Jay Parker'; 'Caitlin Ball'; 'Shanna Jarrell'; 'Weatherly, Lee C.'; 'Thompson, Kristen K.'; 'Richards, Cierra'
Cc: Hines, Russell; Justman, Aimee
Subject: Graham v. Hallmark; Appellate Case No. 2025-000275 (CR 230448)
Attachments: Graham v. Hallmark (2025-000275) -- Motion to File AIRB Out of Time.pdf; Graham v. Hallmark (2025-000275) -- Initial Reply Brief of Appellants.pdf

Enclosed please find the following for service upon you in the above-referenced matter:

1. Appellants Motion for Leave to File/Serve their Initial Reply Brief Out of Time; and
2. Initial Reply Brief of Appellants.

Thank you,

Pollyana Bell

Legal Secretary to Stephen L. Brown,
Russell G. Hines, Stephen A. Griffith, Jr.
Commercial Litigation Practice Group
Phone:(843)720-5488 | Fax:(843)579-1369



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

MatterId: