

**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

RECEIVED

Dec 15 2025

SC Court of Appeals

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
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Attorneys for Appellants

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that the **FINAL REPLY BRIEF OF APPELLANTS** and **APPELLANTS' CERTIFICATION FOR FINAL REPLY BRIEF** 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 December 15, 2025, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

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Curana Health of South Carolina, PC
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Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/Russell G. Hines
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Attorneys for Appellants

Charleston, South Carolina

December 15, 2025

Justman, Aimee

From: Justman, Aimee
Sent: Monday, December 15, 2025 1:59 PM
To: lcope@parkerlawgroupsc.com; jayparker@parkerlawgroupsc.com; sgoldberg@steinberglawfirm.com; lweatherly@csvl.law; kthompson@csvl.law
Cc: Hines, Russell
Subject: Appeal 2025-000275 - Graham v. Hallmark Long Term Care - CR230448 - Final Reply Brief
Attachments: Final Reply Brief.pdf; Cert - Final Reply Brief.pdf

Good afternoon,

Enclosed for service upon you, please find (1) Final Reply Brief of Appellants; and (2) Appellants' Certification for Final Reply Brief.

Thank you,

Aimee Justman
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