

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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Jan 06 2026

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable Jocelyn Newman
Circuit Court Judge

Civil Action Case No. 2019-CP-40-04185

Appellate Case No. 2024-000548

Crystal Goodwin and James Goodwin Respondents,

v.

Midlands Orthopaedics and Neurosurgery and Thomas J. Holbrook, M.D. Appellants.

PROOF OF SERVICE

The undersigned, counsel for Respondent-Appellant Rhoads, does hereby certify that on the date indicated below the **FINAL BRIEF OF RESPONDENTS** was served on counsel for Appellants Midlands Orthopaedics and Neurosurgery and Thomas J. Holbrook, M.D. via email and via United States Mail, first-class postage pre-paid, to the following:

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<signature on page following>

Respectfully submitted,



January 6, 2026
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SC Court of Appeals

Via Email Only

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Email: ctappfilings@sccourts.org

Re: Crystal Goodwin and James Goodwin v. Midlands Orthopedics and
Neurosurgery and Dr. Thomas J. Holbrook, M.D.
Civil Action No.: 2019-CP-40-04185
Appellate Case No.: 2024-000548

Dear Ms. Kitchings,

Enclosed and for filing, please find the *Final Brief of the Respondents* and *Proof of Service* in connection with the above-referenced matter. Please note that the bound copy of this final brief is being hand delivered to the Court of Appeals tomorrow.

Should you have any questions or require any additional information, please do not hesitate to contact our office directly.

Kindest regards,

Ashley M. Cashdollar

Enclosure(s): *as stated*

cc: Robert F. Goings, Sr., Esq. (via email at rgoings@goingslawfirm.com)
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