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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

Appeal from Charleston County
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

Appellate Case No. 2025-000286

William Haynes as Personal Representative of the Estate of Elizabeth Varner,

Respondent,

v.

Fundamental Services LLC, Fundamental Clinical and Operational Services LLC, and Jerrolyn
Montgomery-Small,

Appellants.

PROOF OF SERVICE

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Attorney for Respondent

I, Shawn Pinkston, of the Pinkston Law Firm, LLC, attorney for Respondent, hereby certify that **RESPONDENT'S FINAL BRIEF** was served on Appellant by electronic mail (see attached emails) a copy of the same to Appellants' Counsel of Record:

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Respectfully,

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/s/Shawn Pinkston

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Attorneys for Respondent


Mount Pleasant, South Carolina
March 26, 2026

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From: Shawn Pinkston shawnpinkston@me.com 

Subject: Haynes v. Fundamental (2025-000286) -- Respondent's Final Brief

Date: March 26, 2026 at 3:12 PM

To: Hines, Russell RHines@yclr.com, Brown, Stephen L. sbrown@yclr.com, Davis, Jay jdavis@yclr.com, Riddle, Matthew MRiddle@yclr.com

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Russ,

See attached Respondent's Final Brief. Thank you.

Respondent Final Brief.pdf

712 KB



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