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**Apr 20 2026**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

William C. McMaster, III, Circuit Court Judge

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Case No. 2025-CP-23-01759

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Kimberly Haag, Individually  
and as Personal Representative  
of the Estate of Raymond  
Zeigler, Respondent,

v.

Carlyle Senior Care of Fountain Inn,  
LLC; Carlyle Senior Care Management  
Company, Inc.; New Day Health  
Ventures, LLC; LARK of Fountain Inn,  
LLC; Fountain Inn Healthcare, LLC  
d/b/a Fountain Inn Post Acute;  
Providence Group, Inc.; Providence  
Administrative Consulting Services,  
Inc.; PACS Group, Inc.; PACS  
Holdings, LLC; and 501 Gulliver  
Property, LLC, Defendants,

of which

Carlyle Senior Care of Fountain Inn,  
LLC; Carlyle Senior Care Management  
Company, Inc.; New Day Health  
Ventures, LLC; and LARK of Fountain  
Inn, LLC are the Appellants.

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PROOF OF SERVICE

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I hereby certify that on this 20<sup>th</sup> day of April 2026, a true and correct copy of the above and foregoing Appellants' Reply Brief was served upon counsel of record by email and US Mail to the following:

Matthew W. Christian, Esq.  
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*Counsel for Co-Appellants Fountain Inn  
Healthcare d/b/a Fountain Inn Post Acute,  
Providence Group, Inc., Providence  
Administrative Consulting Services, Inc.,  
PACS Group, Inc., PACS Holding, LLC,  
and 501 Gulliver Property, LLC*

April 20, 2026

**HALL BOOTH SMITH, P.C.**

*/s/ Ashley S. Heslop*

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*Counsel for Appellants Carlyle Senior Care of  
Fountain Inn, LLC; Carlyle Senior Care  
Management Company, Inc.; New Day Health  
Ventures, LLC; and LARK of Fountain Inn, LLC*

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Apr 20 2026

Susan Creel

SC Court of Appeals

**From:** Susan Creel  
**Sent:** Monday, April 20, 2026 5:07 PM  
**To:** 'mchristian@cclawfirm.com'; 'nstewart@burr.com'; 'cmcqueeney@burr.com';  
'bcrites@burr.com'; 'ctabrizian@burr.com'  
**Cc:** Ashley Heslop; Caroline Buchanan; Monica D. Waters; Amanda Johnson  
**Subject:** Zeigler v. Carlyle Senior Care Fountain Inn [HBS-DMS.FID2894378]  
**Attachments:** Zeigler - Reply Brief 4.20.26.pdf

Gentlemen,

Please find enclosed for service Appellants' Reply Brief in the referenced matter. A copy will be sent by US Mail as well.

Best regards,

April 20, 2026

**VIA EMAIL**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street, Suite 200  
Columbia, SC 29201-3739  
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**RECEIVED**  
**Apr 20 2026**  
**SC Court of Appeals**

Re: Kimberly Haag, Individually and as Personal Representative of the Estate of  
Raymond Zeigler v. Carlyle Senior Care of Fountain Inn, LLC, et al.  
Case No.: 2025-CP-23-01757 AND 2025-CP-23-01759  
Appellate Case No. 2025-002264

Dear Ms. Kitchings:

Please find enclosed for service Appellants' Reply Brief and Proof of Service in the referenced matter. I have also enclosed a copy of our email serving counsel of record with these documents.

With kind regards, I am

Very truly yours,

*/s/ Ashley S. Heslop*

Ashley S. Heslop

ASH/sec

Enclosures

cc: Matthew W. Christian, Esq.  
Nicholas Clarence Chapman Stewart, Esq.  
Daniel S. McQueeney, Jr., Esq.  
J. Bennett Crites, III, Esq.  
Cameron A. Tabrizian, Esq.