

THE STATE OF SOUTH CAROLINA
In the Supreme Court

RECEIVED

Jul 09 2026

S.C. SUPREME COURT

APPEAL FROM FAIRFIELD COUNTY
Court of Common Pleas

Patrick C. Fant, III, Circuit Court Judge

Appellate Case No.: 2026-001309

Thomas D. Kilpatrick
as Special Administrator for the Estate of Anthony Lemon,.....Respondent,

v.

Pruitthealth - Ridgeway, LLC f/k/a Unihealth Post-Acute Care –
Tanglewood, LLC, United Health Services of South Carolina,
Inc., Pruitthealth Consulting Services, Inc., Pruitthealth
Therapy Services, Inc. f/k/a United Rehab, Inc., Pruitthealth, Inc.,
Neil Pruitt, Jr., THI of South Carolina at Columbia, LLC d/b/a
Midlands Health and Rehabilitation Center, THI of South
Carolina, LLC, Fundamental Clinical and Operational Services,
LLC, Fundamental Clinical Consulting, LLC, Fundamental
Long Term Care Holdings, Inc., Fundamental Administrative
Services, LLC, and Hunt Valley Holdings, LLC,..... Defendants,

Of whom THI of South Carolina at Columbia, LLC d/b/a Midlands Health and
Rehabilitation Center, THI of South Carolina, LLC, Fundamental Clinical and
Operational Services, LLC, Fundamental Administrative Services, LLC, and
Hunt Valley Holdings, LLC, are..... Petitioners.

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing Respondent's Motion to Dismiss the Petition for a Writ of Certiorari and for Sanctions has been served upon the following counsel of record by emailing a copy of the same, this 9th day of July 2026.

CLEMENT RIVERS, LLP

D. Jay Davis, Jr. Esquire
jdavis@ycrlaw.com
Stephen L. Brown, Esquire
sbrown@ycrlaw.com
Matthew O. Riddle. Esquire
mriddle@ycrlaw.com
Gaillard T. Dotterer, III. Esquire
gdotterer@ycrlaw.com
Russell G. Hines. Esquire
rhines@ycrlaw.com

25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Appellants

SMYTH WHITLEY, LLC

Joshua S. Whitley. Esquire
jwhitley@smythwhitley.com
Allie A. Maples. Esquire
amaples@smythwhitley.com

126 Seven Farms Drive, Suite 260
Charleston, South Carolina 29492
(843) 606-5635

**Attorneys for Defendants
Pruitthealth Ridgeway, LLC**

Respectfully submitted,

PARKER LAW GROUP, LLP

By: _____



Neil E. Alger (SC Bar #100530)
John E. Parker, Jr. (SC Bar #104225)
101 Mulberry Street, East
P.O. Box 487
Hampton, SC 29924
Phone: (803) 903-1781
nalger@parkerlawgroupsc.com
jayparker@parkerlawgroupsc.com

ATTORNEYS FOR RESPONDENT