

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM FAIRFIELD COUNTY
Court of Common Pleas

Patrick C. Fant, III, Circuit Court Judge

Appellate Case No.: 2026-001309

RECEIVED

Aug 14 2026

SC Court of Appeals

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 which 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 Reply to Return to Motion to Dismiss has been served upon the following counsel of record by emailing a copy of the same, this 13th day of August, 2026.

CLEMENT RIVERS, LLP

D. Jay Davis, Jr. (SC Bar No. 12084)
jdavis@ycrlaw.com
Stephen L. Brown (SC Bar No. 66468)
sbrown@ycrlaw.com
Matthew O. Riddle (SC Bar No. 76650)
mriddle@ycrlaw.com
Russell G. Hines (SC Bar No. 72100)
rhines@ycrlaw.com
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

ATTORNEYS FOR PETITIONERS

SMYTH WHITLEY, LLC

Joshua S. Whitley (SC Bar No. 77826)
jwhitley@smythwhitley.com
Allie A. Maples (SC Bar No. 105526)
amaples@smythwhitley.com
126 Seven Farms Drive, Suite 260
Charleston, South Carolina 29492
(843) 606-5635

ATTORNEYS FOR PRUITTHEALTH

Respectfully submitted,

PARKER LAW GROUP, LLP

August 13, 2026
Hampton, South Carolina

By: _____



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

ATTORNEYS FOR RESPONDENT