

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

Case No. 2016-CP-40-04463

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JAN 22 2019

Jean Watkins, as Personal
Representative of the
Estate of Mildred
Watkins,

Respondent **SC Court of Appeals**

v.


Sterling Healthcare, Inc., Country
Wood Nursing Center, LLC, and
Guardian Resources, LLC,

Appellants.

CERTIFICATE OF COUNSEL

The undersigned certifies that this Final Reply Brief complies
with Rule 211(b), SCACR.

December 28, 2018



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in the trial court to justify both her original motion to compel and her later motion for sanctions. But the reiteration of these *factual* points does not address the *legal* deficiency of the trial court's order. The crux of this appeal is not whether Respondent provided factual support for her arguments, nor whether the trial court had the opportunity to mull over those points. Because even if this Court were to accept both as given, this issue persists: the trial court failed to set forth an adequate basis for the exercise of its discretion to strike Appellants' Answers.

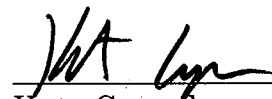
This failing constitutes an abuse of discretion as a matter of law.

CONCLUSION

WHEREFORE, for the foregoing reasons and for the reasons set forth in the Initial Brief of Appellants, this Court should REVERSE the trial court's order striking Appellants' Answers.

Respectfully submitted,

December 20, 2018



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