

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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Appeal from Greenville County  
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

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Case No. 2018-CP-23-05088

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Estate of Mozana Clinkscales, by and through the  
appointed Personal Representative Charlie E. Clinkscales,  
Individually, and on behalf of Statutory Beneficiaries,

Respondents,

v.

Fundamental Clinical and Operational Services, LLC;  
Fundamental Administrative Services, LLC; and  
THI of South Carolina at Magnolia Place at Greenville, LLC  
d/b/a Magnolia Place-Greenville,

Appellants.

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**NOTICE OF APPEAL**

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YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
Perry M. Buckner, IV (SC Bar No. 100031)  
J. Joseph Owens (SC Bar No. 102794)  
Russell G. Hines (SC Bar No. 72100)  
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P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Appellants*

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MAY 28 2019

SC Court of Appeals

**Other Counsel of Record:**

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215 Magnolia Street  
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*and*

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CHRISTIAN & DAVIS, LLC  
1007 E. Washington Street  
Greenville, South Carolina 29601  
(864) 408-8890

*Attorneys for Respondents*

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d/b/a Magnolia Place-Greenville,

Appellants.

**PROOF OF SERVICE**

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
Perry M. Buckner, IV (SC Bar No. 100031)  
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(843) 720-5488

*Attorneys for Appellants*

I, Russell G. Hines, of Young Clement Rivers, LLP, attorney for Appellants, hereby certify that the foregoing **NOTICE OF APPEAL** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on May 28, 2019, properly posted for delivery to the following addressees:

Gary W. Poliakoff, Esquire  
Raymond P. Mullman, Jr., Esquire  
Poliakoff & Associates, PA  
215 Magnolia Street  
Spartanburg, SC 29306

*and*

Matthew W. Christian, Esquire  
Christian & Davis, LLC  
1007 E. Washington Street  
Greenville, SC 29601

*Attorneys for Respondents*

I further certify that a copy of this **NOTICE OF APPEAL** is this day, May 28, 2019, being E-Filed with the lower court (which will also, i.e., in addition to service by mail, effect service of the notice electronically on all counsel of record).

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

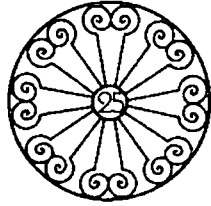
By: 

Russell G. Hines (SC Bar No. 72100)

*Attorneys for Appellants*

Charleston, South Carolina

Dated: 5/28/19



# YCR LAW

Tiffany L. Bates  
Legal Secretary

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May 28, 2019

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MAY 28 2019  
SC Court of Appeals

**Via Facsimile and U.S. Mail**

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: Estate of Mozana Clinkscales, by and through the appointed Personal Representative Charlie E. Clinkscales, Individually and on behalf of Statutory Beneficiaries vs. Fundamental Clinical and Operational Services, LLC, Fundamental Administrative Services, LLC, and THI of South Carolina at Magnolia Place at Greenville, LLC d/b/a Magnolia Place-Greenville  
Circuit Court Case No.: 2018-CP-23-05088  
YCR File: 14347-20160580

Dear Ms. Kitchings:

Enclosed herewith for filing with regard to the above-referenced matter please find the following:

- The original and two (2) copies of a Notice of Appeal;
- The original and two (2) copies of a Proof of Service regarding the same;
- Our firm's check in the amount of \$250.00 for the required filing fee.

Please file these documents and return to us a court-stamped copy of each filed document in the envelope provided.

By copy of this correspondence, I am serving the Notice of Appeal upon Respondent's counsel. I am also e-filing the Notice of Appeal in the lower court.

May 28, 2019

Page 2

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Thank you for your assistance with this matter. Of course, if the Court has any questions or concerns, or needs anything further at this time, please do not hesitate to contact our office. With best regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

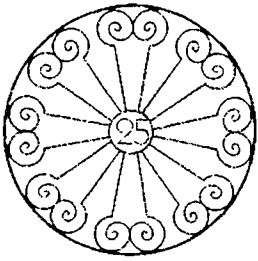
  
Tiffany L. Bates  
Legal Secretary

TLB/

Enclosures

cc (w/enc., via email and U.S. Mail): Gary W. Poliakoff, Esquire  
Raymond P. Mullman, Jr., Esquire  
Matthew W. Christian, Esquire

cc (w/enc., via e-filing): Greenville County Clerk of Court



# YCR LAW

Young Clement Rivers, LLP

All Business, Insurance, Real Estate and Regulatory Matters  
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Commercial Real Estate • Commercial Transactions  
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Employment and Labor Law • Health Care • Insurance Coverage  
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Special Task Litigation • Tax, Estate Planning and Probate  
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THE FOLLOWING PAGES ARE FOR IMMEDIATE DELIVERY

To: 18037341839  
From: [tbates@ycrlaw.com](mailto:tbates@ycrlaw.com)  
Date: May 28, 01:13:44 PM EDT  
Subj: Notice of Appeal - Clinkscales v. Fundamental Clinical and Operational Services, LLC, et al.  
Pages: 25

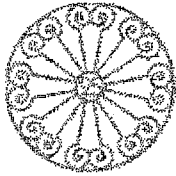
Please see attached. Thank you.

Tiffany L. Bates  
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