

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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DEC 04 2019

Appeal from York County  
Court of Common Pleas

SC Court of Appeals

William A. McKinnon, Circuit Court Judge

Case No. 2018-CP-46-01459

Teresa Murphy, as Personal Representative for the Estate of Isaac Strong,

Respondent,

v.

Hunt Valley Holdings, LLC f/k/a Fundamental Long-Term Care Holdings, LLC;  
Fundamental Clinical and Operational Services, LLC; Fundamental Consulting,  
LLC; Fundamental Administrative Services, LLC; THI of Baltimore, Inc.; THI of  
South Carolina, LLC; THI of South Carolina at Rock Hill, LLC d/b/a Magnolia  
Manor of Rock Hill; and Amisub of S.C., Inc. d/b/a Piedmont Medical Center,

Defendants,

Of which Fundamental Clinical and Operational Services, LLC; Fundamental  
Administrative Services, LLC; THI of South Carolina, LLC; and THI of South  
Carolina at Rock Hill, LLC d/b/a Magnolia Manor of Rock Hill are

Appellants.

**PROOF OF SERVICE**

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
Russell G. Hines (SC Bar No. 72100)  
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(843) 720-5488

*Attorneys for Appellants*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellants, certify that the **Final Brief of Appellants**, the **Final Reply Brief of Appellants**, and **Appellants' Certification for Final Brief and Final Reply Brief** were served on all other parties to this matter by depositing a copy of same in the U.S. Mail on December 3, 2019, properly posted for delivery to the following addressees:

Chad A. McGowan, Esquire  
Eve S. Goodstein, Esquire  
McGowan, Hood & Felder, LLC  
1539 Health Care Drive  
Rock Hill, SC 29732

*and*

John Gressette Felder, Jr., Esquire  
McGowan, Hood & Felder, LLC  
1517 Hampton Street  
Columbia, SC 29201

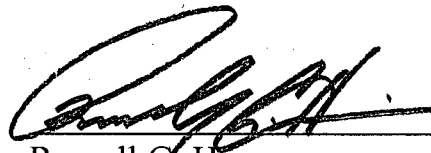
*Attorneys for Respondent  
Teresa Murphy, as Personal Representative  
for the Estate of Isaac Strong*

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*Attorneys for Defendant  
Amisub of South Carolina, Inc.  
d/b/a Piedmont Medical Center*

Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

By:

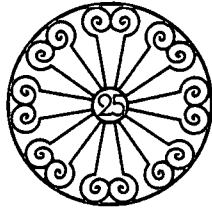


Russell G. Hines (SC Bar No. 72100)

*Attorneys for Appellants*

Charleston, South Carolina

Dated: 12/3/19



YCR LAW

Katy B. Barnes  
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December 3, 2019

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SC Court of Appeals

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

Re: Teresa Murphy, as Personal Representative for the Estate of Isaac Strong v. Hunt Valley Holdings, LLC, et al  
Appellate Case No. 2019-000028  
Case No.: 2018-CP-46-01459  
Claim No.: HBLM# 1727638  
YCR File: 14347-20170985

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter, please find the following:

1. Original and sixteen (16) copies of the Final Brief of Appellants;
2. Original and sixteen (16) Copies of the Final Reply Brief of Appellants;
3. Original and one (1) copy of the Certification for Final Brief and Final Reply Brief; and
4. Original and one (1) copy of the Proof of Service for same.

Please file the originals and return a court stamped copy of each to me in the enclosed envelope.

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
December 3, 2019  
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Thank you for your assistance with this matter. With best wishes and kindest regards, I  
am

Sincerely,

YCRLAW, LLP



Katy B. Barnes  
Legal Secretary

Enclosures

cc: Chad A. McGowan Esquire, McGowan, Hood & Felder, LLC  
Eve S. Goodstein, Esquire, McGowan, Hood & Felder, LLC  
John G. Felder, Jr., Esquire, McGowan, Hood, Felder, LLC  
William B. Darwin, Jr., Holcombe Bomar, P.A.  
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