

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

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Appeal from Charleston County  
Court of Common Pleas  
Jennifer B. McCoy, Circuit Court Judge

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Appellate Case No. 2019-001413  
Circuit Court Case No. 2018-CP-10-01251

**RECEIVED**

FEB 24 2020

SC Court of Appeals

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Richard Ladson, Jr., by and through Richard Miles Ladson, Sr., POA Respondent,

v.

THI of South Carolina at Charleston, LLC, Appellant.  
d/b/a Riverside Health and Rehab,

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**PROOF OF SERVICE**

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I, Benjamin C. Smoot, II, of Pierce, Sloan, Kennedy & Early, LLC, counsel for Respondent Richard Ladson, Jr., by and through Richard Miles Ladson, Sr., POA, hereby certify that the foregoing **INITIAL BRIEF OF RESPONDENT** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on February 7, 2020, properly posted for delivery to the following addressees:

Young Clement Rivers, LLP  
Stephen L. Brown  
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*Attorneys for Appellant*

*[Signature Page to Follow]*

Respectfully submitted,

PIERCE, SLOAN, KENNEDY & EARLY,  
LLC

By:

BCS

Benjamin C. Smoot, II (SC BAR NO.  
101372)

*Attorney for Respondent Richard Ladson,  
Jr., by and through Richard Miles Ladson,  
Sr., POA.*

Charleston, South Carolina

Dated: 2/21/20

CARL E. PIERCE, II  
ALLAN P. SLOAN, III \*◆  
JAMES G. KENNEDY  
WILLIAM P. EARLY ●  
SONALY K. HENDRICKS  
BENJAMIN C. SMOOT, II ■  
J. MORGAN FORRESTER

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February 21, 2020

**VIA U.S. MAIL**

The Honorable Jenny Abbott Kitchings  
Clerk, S.C. Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

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FEB 24 2020  
SC Court of Appeals

Re: *Richard Ladson, Jr., by and through Richard Miles Ladson, Sr., POA v. THE OF  
South Carolina at Charleston, LLC. d/b/a Riverside Health and Rehab  
Circuit Court C/A No. 2016-CP-10-4062  
Appellate Case No.: 2019-001413  
PSWKE File No.: P2812.00*

Dear Ms. Kitchings:

Enclosed for filing please find the original and one (1) copy of the Proof of Service for the Initial Brief of Respondent. Please file the original with the Court and provide our office with a filed copy in the enclosed self-addressed envelope. Should you have any questions or concerns, please do not hesitate to contact our office.

Please feel free to contact me with any questions or concerns you may have.

With kind regards,

Sincerely,



Kelly D. Forrester  
Paralegal to Benjamin C. Smoot, II

Enclosures

cc: Stephen L. Brown, Esq.  
D. Jay Davis, Jr., Esq.  
Russell G. Hines, Esq.

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KENNEDY & EARLY LLC

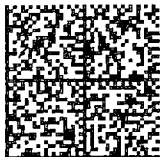
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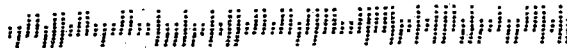
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The Honorable Jenny Abbott Kitchings  
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