

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Robin B. Stillwell, Circuit Court Judge

Appellate Case No. 2019-000887

**RECEIVED**

**Jun 08 2020**

**SC Court of Appeals**

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

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.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on June 8, 2020, he served Appellants' counsel with Respondent's Final Brief and Certificate of Counsel at the e-mail addresses listed below pursuant to Section (g)(3) of the South Carolina Supreme Court's March 20, 2020 order (Order No. 2020-03-20-01):

sbrown@ycrlaw.com  
jdavis@ycrlaw.com  
rhines@ycrlaw.com

/s/ Jordan C. Calloway  
Jordan C. Calloway  
Attorney for Respondent

**Clinkscales v. Fundamental Clinical & Operational Services, LLC et al. (Appellate Case No. 2019-000887) Respondent's Final Brief**

Jordan Calloway &lt;jordan@mcgowanhood.com&gt;

Mon 6/8/2020 1:29 PM

**To:** sbrown@ycrlaw.com <sbrown@ycrlaw.com>; Davis, Jay (jdavis@ycrlaw.com) <jdavis@ycrlaw.com>; Hines, Russell <RHines@ycrlaw.com>**Cc:** Boss Poliakoff <atty@gpoliakoff.com>; Ray Mullman <rmullmanjr@gmail.com>; Matt Christian <mchristian@cclawfirm.com> 3 attachments (390 KB)

M. Clinkscales--CoS (Resp. Final Br.) PDF.pdf; M. Clinkscales--Certificate of Counsel (Resp.'s Final Br.) PDF.pdf; M. Clinkscales--Final Respondent's Brief FINAL PDF.pdf;

**Counsel:**

I am attaching Respondent's Final Brief and Certificate of Counsel that are being electronically filed today with the Court of Appeals. Pursuant to Section (g)(3) of the South Carolina Supreme Court's March 20, 2020, order (Order No. 2020-03-20-01), please consider this email as service for both documents.

Thanks,

Jordan Calloway  
McGowan, Hood & Felder, LLC  
1539 Health Care Drive  
Rock Hill, SC 29732  
(803) 327-7800

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**Jun 08 2020**  
**SC Court of Appeals**