

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

Appeal from Charleston County
Court of Common Pleas

The Honorable Jennifer B. McCoy, Circuit Court Judge

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

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

Respondent,

v.

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

Appellant.

PROOF OF SERVICE

I, Benjamin Catlett Smoot II, of Pierce Sloan LLC counsel for Respondent Richard Ladson, Jr., and through Richard Miles Ladson, Sr., POA, hereby certify that the foregoing **RESPONDENT'S BRIEF** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on June 23, 2020, properly posted for delivery to the following address:

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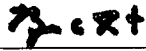
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SC Court of Appeals

Respectfully Submitted,

PIERCE | SLOAN, LLC



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June 23, 2020
Charleston, South Carolina

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◆ CERTIFIED SC CIRCUIT
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June 22, 2020

VIA U.S. MAIL

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

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

Dear Ms. Kitchings:

Enclosed for filing please find the original and one (1) unbound copy and fifteen (15) bound copies of the Respondent's Brief in the above-referenced matter. 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

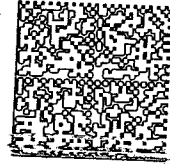
Paralegal to Benjamin C. Smoot, II

Enclosures

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

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