

**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

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**RECEIVED**  
JUN 25 2020  
SC Court of Appeals

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.

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**PROOF OF SERVICE**

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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)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Appellant*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellant, hereby certify that the foregoing **FINAL BRIEF OF APPELLANT** 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 addressees:

Carl E. Pierce, II  
Benjamin C. Smoot, II  
PIERCE, HERNS, SLOAN & WILSON, LLC  
321 East Bay Street  
Charleston, South Carolina 29401

*Attorneys for Respondent*

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By:



Russell G. Hines (SC Bar No. 72100)

*Attorneys for Appellant*

Charleston, South Carolina

Dated:

6/23/20

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Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
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P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Appellant*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellant, hereby certify that the foregoing **APPELLANT'S CERTIFICATION FOR FINAL 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 addressees:

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*Attorneys for Respondent*

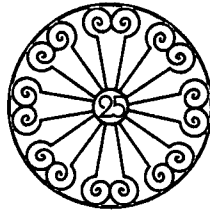
Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

By:   
Russell G. Hines (SC Bar No. 72100)

*Attorneys for Appellant*

Charleston, South Carolina

Dated: 6/23/20



# YCR LAW

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June 23, 2020

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

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JUN 25 2020

SC Court of Appeals

Re: Richard Ladson v. THI of South Carolina at Charleston  
Appellate Case No. 2019-001413  
Case No.: 2019-001413  
Claim No.: 1725747  
YCR File: 14347-20170914

Dear Ms. Kitchings:

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

- the original and sixteen (16) copies of the **Final Brief of Appellant**;
  - the original and one (1) copy of **Appellant's Certification for Final Brief**;
  - the original and one (1) copy of a **Proof of Service** of Final Brief of Appellant; and
  - the original and one (1) copy of a **Proof of Service** of Appellant's Certification for Final Brief.
- 
- the original and sixteen (16) copies of the **Final Reply Brief of Appellant**;
  - the original and one (1) copy of **Appellant's Certification for Final Reply Brief**;
  - the original and one (1) copy of a **Proof of Service** of Final Reply Brief of Appellant; and
  - the original and one (1) copy of a **Proof of Service** of Appellant's Certification for Final Reply Brief.

Kindly file the originals and return one court-stamped copy to me using the pre-stamped envelope provided. With best wishes and kindest regards, I am

Sincerely,

YOUNG-CLEMENT RIVERS, LLP

Russell G. Hines  
Partner

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
June 23, 2020  
Page 2 of 2

RGH/amj  
Enclosures

cc: Benjamin Catlett Smoot II, Pierce Sloan Kennedy & Early, LLC  
Carl E. Pierce II, Esquire, Pierce Sloan Kennedy & Early, LLC

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SC Court of Appeals

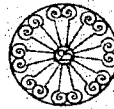
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