

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

Appeal from Charleston County
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

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

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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.

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)
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 REPLY 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, Esquire
Benjamin C. Smoot, II, Esquire
Carl E. Pierce, III, Esquire
Pierce Sloan Kennedy & Early, 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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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 REPLY 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:

Carl E. Pierce, II
Benjamin C. Smoot, II
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Charleston, South Carolina 29401

Attorneys for Respondent

Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By:



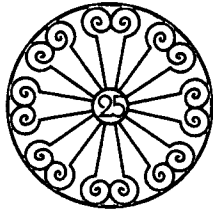
Russell G. Hines (SC Bar No. 72100)

Attorneys for Appellant

Charleston, South Carolina

Dated:

6/23/20



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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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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

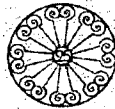
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