

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

Appeal from Greenville County
Court of Common Pleas

RECEIVED

Robin B. Stilwell, Circuit Court Judge JUN 24 2020

Case No. 2018-CP-23-05088

SC Court of Appeals

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

Respondents,

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.

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 Appellants

I, Russell G. Hines, of Young Clement Rivers, LLP, attorney for Appellants, hereby certify that the foregoing **FINAL BRIEF OF APPELLANTS** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on June 22, 2020, properly posted for delivery to the following addressees:

Gary W. Poliakoff, Esquire
Raymond P. Mullman, Jr., Esquire
Poliakoff & Associates, PA
215 Magnolia Street
Spartanburg, SC 29306

and

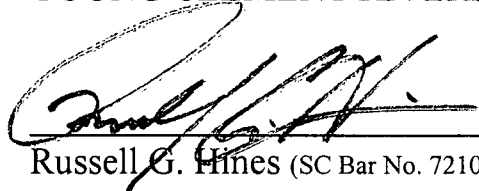
Matthew W. Christian, Esquire
Christian & Davis, LLC
1007 E. Washington Street
Greenville, SC 29601

Attorneys for Respondents

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By:



Russell G. Hines (SC Bar No. 72100)

Attorneys for Appellants

Charleston, South Carolina

Dated: 6/22/20

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

Appeal from Greenville County
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

RECEIVED

JUN 24 2020

Case No. 2018-CP-23-05088 **SC Court of Appeals**

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

Respondents,

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.

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 Appellants

I, Russell G. Hines, of Young Clement Rivers, LLP, attorney for Appellants, hereby certify that the foregoing **APPELLANTS' 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 22, 2020, properly posted for delivery to the following addressees:

Gary W. Poliakoff, Esquire
Raymond P. Mullman, Jr., Esquire
Poliakoff & Associates, PA
215 Magnolia Street
Spartanburg, SC 29306

and

Matthew W. Christian, Esquire
Christian & Davis, LLC
1007 E. Washington Street
Greenville, SC 29601

and

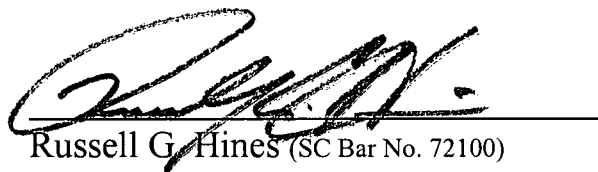
Jordan C. Calloway, Esquire
McGowan, Hood & Felder, LLC
1539 Health Care Drive
Rock Hill, SC 29732

Attorneys for Respondents

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

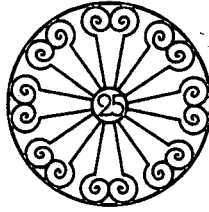
By:


Russell G. HINES (SC Bar No. 72100)

Attorneys for Appellants

Charleston, South Carolina

Dated: 6/22/20



YCR LAW

Russell G. Hines
Partner

Direct Dial: (843) 720-5488
Direct Fax: (843) 579-1327
E-mail: RHines@ycrlaw.com

June 22, 2020

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

RECEIVED

JUN 24 2020

SC Court of Appeals

Re: Estate of Mozana Clinkscales, by and through the appointed Personal Representative Charlie E. Clinkscales, Individually and on behalf of Statutory Beneficiaries vs. Fundamental Clinical and Operational Services, LLC, Fundamental Administrative Services, LLC; THI of South Carolina at Magnolia Place at Greenville, LLC, d/b/a Magnolia Place-Greenville; and Rusty Flathmann
Appellate Case No.: 2019-000887
Case No.: 2018-CP-23-05088
Claim No.: HBLM#1624932
YCR File: 14347-20160580

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 Appellants**;
- the original and one (1) copy of **Appellants' Certification for Final Brief**;
- the original and one (1) copy of a **Proof of Service** of Final Brief of Appellants; and
- the original and one (1) copy of a **Proof of Service** of Appellants' Certification for Final Brief.

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

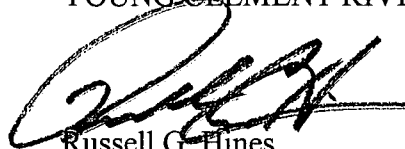
Kindly file the originals and return one court-stamped copy to me using the pre-stamped envelope provided.

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
June 22, 2020
Page 2 of 2

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP


A handwritten signature in black ink, appearing to read "Russell G. Hines", written over a horizontal line.

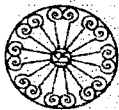
Russell G. Hines
Partner

RGH/amj
Enclosures

cc: Matthew W. Christian, Christian & Davis LLC
Gary W. Poliakoff, Esquire, Poliakoff & Associates, P.A.
Raymond P. Mullman, Jr., Esquire, Poliakoff & Associates, P.A.
Jordan C. Calloway, Esquire, McGowan, Hood & Felder, LLC

FIRST CLASS MAIL

Hasler	PRIORITY MAIL
06/22/2020	
US POSTAGE	\$012.30⁰⁰
	ZIP 29401 011 E12650887



YCRLAW 25 Calhoun Street, Suite 400
P.O. Box 993
Charleston, SC 29402-0993

RGH
14347-
20160580

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

RECEIVED
JUN 24 2020
SC Court of Appeals