

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

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Appeal from Greenville County  
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

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Case No. 2018-CP-23-05088

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**RECEIVED**  
JUN 24 2020  
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.

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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 Appellants*

I, Russell G. Hines, of Young Clement Rivers, LLP, attorney for Appellants, hereby certify that the foregoing **APPELLANTS' 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 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

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*Attorneys for Appellants*

I, Russell G. Hines, of Young Clement Rivers, LLP, attorney for Appellants, hereby certify that the foregoing **FINAL REPLY 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:

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*Attorneys for Respondents*

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: 


Russell G. Hines (SC Bar No. 72100)

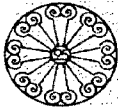
*Attorneys for Appellants*

Charleston, South Carolina

Dated: 6/22/20

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