

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

Appeal from Greenville County  
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

Case No. 2019-CP-23-00473

**RECEIVED**  
SEP 11 2020  
SC Court of Appeals

Estate of Patricia Royston, by and through  
the appointed Personal Representative, Marianne McCoig,  
Individually, and on behalf of the statutory beneficiaries,

Respondent,

v.

Hunt Valley Holdings, LLC  
a/k/a Fundamental Long Term Care Holdings, LLC;  
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)  
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P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Appellants*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellants, hereby certify that the **FINAL REPLY BRIEF OF APPELLANTS** and **APPELLANTS' CERTIFICATION FOR FINAL REPLY BRIEF** were served on all other parties to this matter by depositing a copy of the same in the U.S. Mail on September 9, 2020, properly posted for delivery to the following addressees:

Gary W. Poliakoff, Esquire  
Raymond P. Mullman, Jr., Esquire  
Poliakoff & Associates, P.A.  
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Spartanburg, SC 29304

*and*

Matthew W. Christian, Esquire  
Christian & Christian, LLC  
P.O. Box 332  
Greenville, SC 29602

*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

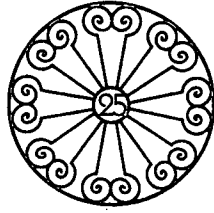
By: 

Russell G. Hines (SC Bar No. 72100)

*Attorneys for Appellants*

Charleston, South Carolina

Dated: 9/9/20



**YCR LAW**

**Pollyana Bell  
Project Assistant**

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September 9, 2020

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SC Court of Appeals

**VIA US MAIL**

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

Re: Estate of Patricia Royston, by and through the appointed Personal Representative, Marianne McCoig, Individually, and on behalf of the statutory beneficiaries, Respondent v. Hunt Valley Holdings, LLC a/k/a Fundamental Long Term Care Holdings, LLC; 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  
Appellate Case No. 2019-001955  
Case No.: 2019-001955  
Claim No.: HBLM# 1725803  
YCR File: 14347-20180896

Dear Ms. Kitchings:

Please find enclosed the following for filing in the above-referenced matter:

- An original and seventeen (16) copies of Appellants' Final Brief
- An original and seventeen (16) copies of Appellants' Final Reply Brief
- An original and one (1) copy of Certification for Final Brief
- An original and one (1) copy of Certification for Final Reply Brief
- An original and one (1) copy of Proof of Service for Final Brief and Certification
- An original and one (1) copy of Proof of Service for Final Reply Brief and Certification

Kindly return one (1) court-stamped copy of each in the pre-stamped envelope. With best wishes and kindest regards, I am

With best wishes and kindest regards, I am

Sincerely,

**YOUNG CLEMENT RIVERS, LLP**

*Pollyana Bell*

Pollyana Bell  
Project Assistant

/pbb

Enclosures

cc: Jordan Calloway, Esquire  
Matthew W. Christian, Esquire  
Gary W. Poliakoff, Esquire  
Raymond P. Mullman, Jr., Esquire

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Hasler

PRIORITY MAIL

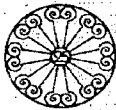
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South Carolina Court of Appeals

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