

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

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Appeal from Spartanburg County  
Court of Common Pleas  
Grace Gilchrist Knie, Circuit Court Judge

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Case No. 2019-CP-42-03075

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**RECEIVED**  
**Oct 15 2020**  
**SC Court of Appeals**

Betty Nanney,  
by and through her Attorney-in-Fact, Leslie Nanney,

Respondent,

v.

THI of South Carolina at Spartanburg, LLC,  
d/b/a Magnolia Manor-Spartanburg, Rusty Flathmann,  
Laura Anne Winn, and Olishia Gaffney,

Appellants.

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**PROOF OF SERVICE**

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*Attorneys for Appellants*

I, Russell G. Hines, of Young Clement Rivers, LLP, attorneys for Appellants, hereby certify that (1) **Appellants' Motion for Leave to File/Serve Initial Reply Brief Out of Time**, (2) the **Initial Reply Brief of Appellants**, and (3) the **Record on Appeal** were served on all other parties to this matter on October 15, 2020, by emailing the same (*see* attached copy of said email) to their counsel of record:

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Respectfully submitted,

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October 15, 2020

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**Subject:** RE: Nanney v. THI (Appellate Case No. 2020-000500) -- Initial Brief of Appellants and Appellants" Designation of Matter  
**Date:** Thursday, October 15, 2020 11:41:51 PM  
**Attachments:** [image001.png](#)  
[Case No. 2020-0500 - Nanney v. THI of SC -- Motion to File Initial Reply Brief Out of Time.pdf](#)  
[Case No. 2020-0500 - Nanney v. THI of SC -- Initial Reply Brief of Appellant.pdf](#)  
[Case No. 2020-0500 - Nanney v. THI of SC -- Record on Appeal.pdf](#)

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Attached please find Appellants' Motion for Leave to File/Serve Initial Reply Brief Out of Time, the Initial Reply Brief of Appellants (conditionally filed/served with the motion), and the Record on Appeal in the above-referenced appeal. They will be filed with the Court of Appeals via separate email.

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