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OCT 27 2020

SC Court of Appeals

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

Appeal from Spartanburg County
Court of Common Pleas

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Oct 22 2020

SC Court of Appeals

Grace Gilchrist Knie, Circuit Court Judge

Case No. 2017-CP-42-0326

Appellate Case No. 2020-000357

Rita St. Aubin, Personal Representative of the Estate of Irene Ramsey,

Respondent,

v.

THI of South Carolina at Camp Care, LLC d/b/a Lake Emory Post Acute Care; THI Of South Carolina, LLC; Hunt Valley Holdings, LLC; THI of Baltimore, Inc.; and Casey Caddell as Officer/Manager of THI of South Carolina at Camp Care, LLC d/b/a Lake Emory Post Acute Care,

Appellants.

**RESPONDENT'S MOTION TO SERVE AND FILE RESPONDENT'S FINAL BRIEF
OUTSIDE OF THE FILING DEADLINES SET BY RULE 211, SCACR**

ANASTOPOULO LAW FIRM, LLC
Stefan B. Feidler (SC #101918)
Eric M. Poulin (SC #100209)
Roy T. Willey, IV (SC #101010)
32 Ann Street
Charleston, South Carolina 29403
Phone (843) 614-8888
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Attorneys for the Respondent

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Appellants.

PROOF OF SERVICE

ANASTOPOULO LAW FIRM, LLC
Stefan B. Feidler (SC #101918)
Eric M. Poulin (SC #100209)
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Attorneys for the Respondent

I, Stefan B. Feidler, of the Anastopoulo Law Firm, attorney for Respondent, certify that I have served the **Final Brief of Respondent and Respondent's Motion to Serve and File Respondent's Final Brief Outside of the Filing Deadlines set by Rule 211, SCACR** a on all other parties to this matter via email and by depositing a copy of the same in the United States Mail on October 22, 2020, addressed to and properly posted for delivery to the following addresses:

Russel G. Hines, Esquire
D. Jay Davis, Jr., Esquire
Stephen L. Brown, Esquire
Matthew O. Riddle, Esquire
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Attorneys for Appellants

/s/ Stefan B. Feidler
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Attorneys for Respondent

Charleston, South Carolina

Dated: October 22, 2020

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REPLY TO ANN STREET OFFICE
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L. CRAYTON WILLIAMS (SC)

*OF COUNSEL

October 22, 2020

Via US Mail

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: Estate of Irene Ramsey v. Lake Emory Post-Acute Care, LLC
Appellate Case No. 2020-000357

Dear Ms. Kitchings,

I hope this letter finds you well. Enclosed you will find Respondent's Final Brief(s). I have also included Respondent's Motion to Serve and File Respondent's Final Brief Outside of the Filing Deadlines set by Rule 211, SCACR and check in the amount of \$50.00 for the filing fee. Respondent would, however, ask that the Court waive the motion and/or motion fee as Respondent's Final Brief was only delinquent due to Appellants failure to timely file/forward the Record on Appeal and Appellants' Final Brief. Consequently, Respondent was unable to proceed with her Final Brief until receipt of the Record on Appeal, which were received by counsel for Respondent via email on October 12, 2020. I have also enclosed a self-addressed envelope should you feel it is appropriate to return the \$50.00 check.

Thank you very much for your assistance.

Sincerely,

/s/ Stefan B. Feidler

Stefan B. Feidler

Cc: Stephen L Brown, Esquire *(via email only)*
D. Jay Davis, Jr., Esquire *(via email only)*
Matthew O. Riddle, Esquire *(via email only)*
Russell G. Hines, Esquire *(via email only)*
Gaillard T. Dotterer, III, Esquire *(via email only)*

Enclosures

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ACTWGT: 5.00 LB
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CHARLESTON, SC 29403
UNITED STATES US

BILL SENDER

TO **JENNY ABBOTT KITCHINGS**
SOUTH CAROLINA COURT OF APPEALS
P.O. BOX 11629

COLUMBIA SC 29211

(843) 614-8888

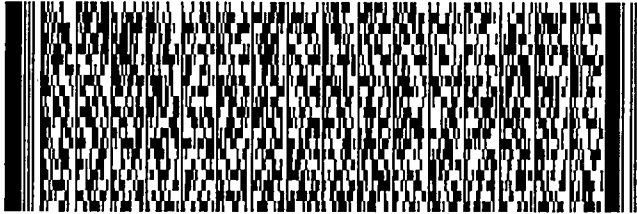
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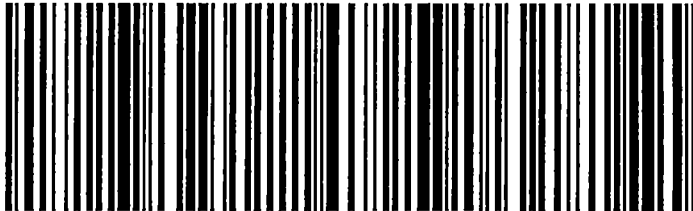
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