

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

---

**RECEIVED**

**Feb 11 2021**

**SC Court of Appeals**

Appeal from Spartanburg County  
Court of Common Pleas

J. Mark Hayes, II, Circuit Court Judge

---

Case No. 2018-CP-42-03447  
Appellate Case No. 2020-001107

---

Estate of Barbara Owens,  
by and through her Personal Representative, Mary Jane McCraw,  
Individually and on behalf of Statutory Beneficiaries,

Respondent,

v.

Fundamental Clinical and Operational Services, LLC;  
Fundamental Administrative Services, LLC;  
THI of South Carolina, LLC;  
THI of South Carolina at Spartanburg, LLC  
d/b/a Magnolia Manor-Spartanburg,

Appellants.

---

**PROOF OF SERVICE**

---

**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)  
Kate C. Mettler (SC Bar No. 103762)  
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 Clement Rivers, LLP, counsel for Appellants, hereby certify that I have served the **INITIAL BRIEF OF APPELLANTS and APPELLANTS' DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** on Respondent on February 10, 2021, via email (see attached) to Respondent's counsel of record:

Gary W. Poliakoff, Esquire  
[atty@gpoliakoff.com](mailto:atty@gpoliakoff.com)  
Raymond P. Mullman, Jr., Esquire  
[rmullmanjr@gpoliakoff.com](mailto:rmullmanjr@gpoliakoff.com)  
Edward John Waelde, Esquire  
[jwaelde@gpoliakoff.com](mailto:jwaelde@gpoliakoff.com)  
POLIAKOFF & ASSOCIATES, P.A.  
P.O. Box 1571  
Spartanburg, SC 29304

Jordan C. Calloway, Esquire  
[jordan@mcgowanhood.com](mailto:jordan@mcgowanhood.com)  
MCGOWAN, HOOD & FELDER, LLC  
1539 Health Care Drive  
Rock Hill, SC 29732

Patrick E. Knie, Esquire  
[pknie@knielaw.com](mailto:pknie@knielaw.com)  
PATRICK E. KNIE LAW OFFICES  
250 Magnolia Street  
Spartanburg, SC 29304

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Russell G. Hines (SC Bar No. 72100)  
*Attorneys for Appellants*

Charleston, South Carolina

February 10, 2021