

**RECEIVED**

**Mar 21 2022**

**SC Court of Appeals**

IN THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

Appeal from the York County Court of Common Pleas  
for the Sixteenth Judicial Circuit

---

Honorable William A. McKinnon, Presiding Judge

---

Appellate Case No. 2021-000907  
C.A. Case No. 2019-CP-46-01736

---

Thomas Lovelace and Carol Lovelace,

Respondents,

v.

The Center for Oral and Maxillofacial  
Surgery, P.A. and Mark Billman, DMD,  
MD,

Appellants.

---

**PROOF OF SERVICE**

---

I certify that I have served the BRIEF OF RESPONDENTS upon the Appellants herein via electronic mail on March 21, 2022 addressed to counsel of record

Joseph J. Tierney, Jr.  
[Joseph.Tierney@rogerstownsend.com](mailto:Joseph.Tierney@rogerstownsend.com)  
Rogers Townsend, LLC  
177 Meeting Street, Ste. 320  
Charleston, SC 29401

Matthew S. Coles  
[mcoles@colesbarton.com](mailto:mcoles@colesbarton.com)  
Coles Barton, LLC  
150 South Perry Street, Ste. 100  
Lawrenceville, GA 30046

*/s/ Bert G. Utsey*

---

Bert G. Utsey, III  
SC Bar No. 10093

March 21, 2022  
Charleston, South Carolina

## Hilda Davis

---

**From:** Hilda Davis  
**Sent:** Monday, March 21, 2022 3:52 PM  
**To:** Joseph Tierney, Jr; mcoles@colesbarton.com; Tracey N. Bugg; 'epoole@colesbarton.com'  
**Cc:** jkassel@kassellaw.com; Theile McVey; 'EMoultrie@kassellaw.com'; Bert Utsey  
**Subject:** Lovelace v. The Center for Oral and Maxillofacial Surgery, PA, et al - Appellate Case No. 2021-000907  
**Attachments:** Brief of Respondents 03.21.2022.pdf; POS Brief of Respondents.pdf

Good afternoon,

Attached is the Brief of Respondent, together with Proof of Service, that we will submit for filing to the Court in the above-referenced appeal..

Kind regards,



Hildegard L. Davis  
Legal Assistant to Bert G. Utsey, III  
2 Amherst Street  
Charleston, SC 29403  
(843) 970-2700 office  
[hilda@cfulaw.com](mailto:hilda@cfulaw.com)

*This e-mail and the information transmitted contains PRIVILEGED and CONFIDENTIAL information and is the property of the sender. If you are not the intended recipient, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination or copying of this information, or the taking of any action in reliance on the content of this information, is strictly prohibited. If you have received this e-mail in error, please notify sender immediately and delete the original transmittal of this information.*