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Jun 17 2022

SC Court of Appeals

**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
Appellate Case No. 2019-001955

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.

**SECOND MOTION FOR EXTENSION OF TIME
TO PETITION FOR REHEARING**

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
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Attorneys for Appellants

COME NOW Appellants, 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, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for a second extension of fifteen (15) days' time to file/serve a petition for rehearing of this matter, which the Court decided via opinion filed May 18, 2022. *See Estate of Patricia Royston v. Hunt Valley Holdings, LLC*, Unpublished Op. No. 2022-UP-203.

Presently, by order of this Court filed June 3, 2022, the deadline to petition for rehearing is Friday, June 17, 2022. Because of work-related and other time commitments, the undersigned counsel for Appellant requests the Court's allowance of fifteen (15) days' additional time to petition for rehearing.

Respectfully, the undersigned submits there is good cause for the Court to grant the relief requested herein, as it is, under the circumstances, a reasonable dispensation, timely sought, consistent with the interests of justice, posing no threat of undue prejudice to any other party.

WHEREFORE, Appellants request that the Court grant them an extension of 15 days' time (running from June 17, 2022) to petition for rehearing. By the undersigned's calculations, the grant of this relief would make the new deadline to petition for rehearing July 5, 2022. ADDITIONALLY, for the same reasons set

forth in support of the within request for an extension of time, Appellants request that the Court hold the present deadline for petitioning for rehearing in abeyance until the Court acts on this motion.

Respectfully submitted,
CLEMENT RIVERS, LLP

By: *s/Russell G. Hines*
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Charleston, South Carolina

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PROOF OF SERVICE

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Attorneys for Appellants

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that Appellants' **SECOND MOTION FOR EXTENSION OF TIME TO PETITION FOR REHEARING** was served on all other parties to this appeal on June 17, 2022, via email (see attached) to their following counsel of record:

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Respectfully submitted,
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By: s/Russell G. Hines
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Charleston, South Carolina

June 17, 2022

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Friday, June 17, 2022 12:25 PM
To: 'atty@gpoliakoff.com'; 'rmullmanjr@gmail.com'; 'mchristian@cclawfirm.com';
'jalloway@mcgowanhood.com'
Cc: Hines, Russell; Justman, Aimee
Subject: Royston v. Hunt Valley Holdings, LLC // Appellate Case No. 2019-001955
Attachments: 2nd Mtn for Ext for Petition for Rehearing.pdf

Enclosed please find Appellants' Second Motion for Extension of Time to Petition for Rehearing which will be filed today in the above-referenced matter.

Thank you,

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