

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

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Appeal from Greenville County  
Court of Common Pleas  
Alex Kinlaw, Jr., Circuit Court Judge

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Appellate Case No. 2022-000398  
Case No. 2020-CP-23-01728

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Debbie Stroud,  
Guardian ad Litem for James C. Stroud,

Respondent,

v.

THI of South Carolina at Greenville, LLC  
d/b/a Magnolia Manor-Greenville,  
THI of Baltimore, Inc., and  
THI of South Carolina, LLC,

Appellants.

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**MOTION FOR EXTENSION OF TIME  
TO FILE/SERVE INITIAL BRIEF OF APPELLANTS**

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CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
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*Attorneys for Appellants*

**RECEIVED**

**Jul 25 2022**

**SC Court of Appeals**

COME NOW Appellants THI of South Carolina at Greenville, LLC d/b/a Magnolia Manor-Greenville, THI of Baltimore, Inc., and THI of South Carolina, LLC, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an extension of thirty (30) days' additional time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed June 28, 2022, the deadline for Appellants' initial brief and designation of matter is July 27, 2022. On account of work-related and other time commitments, Appellants respectfully request that this deadline be extended by 30 days (from July 27, 2022), i.e., through August 26, 2022. Respectfully, Appellants believe that this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellants move this Honorable Court to grant them an additional extension of 30 days' time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving their initial brief and designation of matter would be August 26, 2022, according to the undersigned's calculations. Further, Appellants respectfully request that the Court hold their present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

*[Signature on next page]*

*[Signature page for Motion for Extension of Time to File/Serve Initial Brief of Appellants, Appeal No. 2022-000398]*

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Stephen L. Brown (SC Bar No. 66468)  
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Charleston, South Carolina

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Appellants.

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' **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANTS** was served on Respondent on July 25, 2022, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

C. Daniel Pruitt, Esquire  
[danlaw@bellsouth.net](mailto:danlaw@bellsouth.net)  
300 Pettigru Street  
Greenville, SC 29601  
*Attorney for Respondent*

Respectfully submitted,  
CLEMENT RIVERS, LLP

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

Charleston, South Carolina

July 25, 2022

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Monday, July 25, 2022 4:57 PM  
**To:** 'danlaw@bellsouth.net'  
**Cc:** Hines, Russell; Justman, Aimee  
**Subject:** Stroud v. THI // Appellate Case No. 2022-000398  
**Attachments:** 2nd Motion for Extension - Initial Brief.pdf

Enclosed please find Appellants' Motion for Extension of Time to File/Serve their Initial Brief in the above-referenced matter which will be filed today.

Thank you,

Pollyana Bell  
Project Assistant  
Commercial Litigation Practice Group  
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