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Aug 29 2022

SC Court of Appeals

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

Appeal from Greenville County
Court of Common Pleas

Alex Kinlaw, Jr., Circuit Court Judge

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

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.

**MOTION FOR EXTENSION OF TIME TO AUGUST 29, 2022,
TO FILE AND SERVE INITIAL BRIEF OF APPELLANTS**

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
Matthew O. Riddle (SC Bar No. 76650)
Russell G. Hines (SC Bar No. 72100)
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Charleston, South Carolina 29401
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(843) 720-5488

Attorneys for Appellants

NOW COME 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 this Honorable Court to extend the time for them to file and serve the Initial Brief of Appellants (and corresponding designation of matter) by one (1) business day, i.e., to extend the time for filing and serving the Initial Brief of Appellants August 29, 2022, or, alternatively, to allow Appellants to file and serve the Initial Brief of Appellants out of time on August 29, 2022.

Presently, by order of this Court filed July 26, 2022, the deadline for Appellants' initial brief and designation of matter is today, August 26, 2022. On account of work-related and other time commitments, the undersigned is in need of a small amount of additional time complete the Initial Brief of Appellants and hopes the Court will deem the circumstances worthy of the relief requested herein, the undersigned humbly submitting that the grant of such relief is duly supported as an appropriately modest dispensation that is consistent with the interests of justice that will not result in any undue prejudice to Respondent or delay.

WHEREFORE, Appellants move this Honorable Court to extend the time for them to file and serve the Initial Brief of Appellants (and corresponding designation of matter) by one (1) business day, i.e., to extend the time for filing and serving the Initial Brief of Appellants August 29, 2022, or, alternatively, to

allow Appellants to file and serve the Initial Brief of Appellants out of time on August 29, 2022. Further, Appellants respectfully request that the Court hold their present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Stephen L. Brown (SC Bar No. 66468)
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Attorneys for Appellants

Charleston, South Carolina

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PROOF OF SERVICE

CLEMENT RIVERS, LLP
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Attorneys for Appellants

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that the **MOTION FOR EXTENSION OF TIME TO AUGUST 29, 2022, TO FILE AND SERVE INITIAL BRIEF OF APPELLANTS** was served on Respondent on August 26, 2022, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

C. Daniel Pruitt, Esquire
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

August 26, 2022

Hines, Russell

From: Hines, Russell
Sent: Friday, August 26, 2022 11:58 PM
To: danlaw@bellsouth.net
Cc: Justman, Aimee; Bell, Pollyana (Polly); Davis, Jay; 'Brown, Steve'; Justman, Aimee; Bell, Pollyana (Polly); 'Court Of Appeals Filings'
Subject: Stroud v. THI // Appellate Case No. 2022-000398 -- Appellants' motion for briefing extension to 8-29
Attachments: Stroud v. THI (2022-000398) -- Motion for Extension to 8-29-22.pdf

Attached please find Appellants' motion for a briefing extension to 8-29-22.

The filing fee will be mailed to the Court.

Russell G. Hines
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