

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

Appeal from Greenville County
Court of Common Pleas

Alex Kinlaw, Jr., Circuit Court Judge

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

RECEIVED

Sep 27 2022

SC Court of Appeals

Debbie Stroud, GAL 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 FILE/SERVE INITIAL BRIEF OF RESPONDENT**

The Dan Pruitt Law Firm
C. Daniel Pruitt (SC Bar No. 66497)
300 Pettigru Street
Greenville, SC 29601
864-232-4273

Attorney[s] for Respondent

NOW COME[S] Respondent, by and through her undersigned counsel, pursuant to Rule 263(b), SCACR, and hereby move[s] for an extension of thirty (30) days' additional time to file/serve her initial brief and corresponding designation of matter to be included in the record on appeal.

The current deadline for the initial brief and designation is September 28, 2022. Because of work-related and other time commitments, Respondent respectfully requests that this deadline be extended by 30 days, through October 28, 2022. Respectfully, Respondent believes that this relief is consistent with the interests of justice and will not result in any undue prejudice to any party.

WHEREFORE, Respondent moves this Honorable Court to grant her an extension of 30 days' time to file/serve her initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline would be **October 28, 2022**. According to the undersigned's calculations. Further, Respondent respectfully requests that the Court hold her present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

(signature page to follow)

Respectfully submitted,

By: s/ C. Daniel Pruitt
Bar # 66497
Attorney for Respondent
300 Pettigru Street
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(864) 232-4273
danlaw@bellsouth.net

Greenville, South Carolina

September 27, 2022

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PROOF OF SERVICE

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I, **C. Daniel Pruitt**, of the Dan Pruitt Law Firm, attorney for the Respondent, hereby certify that Respondent's MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF RESPONDENT was served on Appellants' on September 27, 2022, by emailing (see attached email) a copy of the same to Appellants' counsel of record:

Russell G. Hines, Esquire (rhines@ycrlaw.com)
D. Jay Davis, Jr., Esquire (jdavis@ycrlaw.com)
CLEMENT RIVERS, LLP

25 Calhoun Street, Suite 400
Charleston, SC 29401

Attorney for Appellants

Respectfully submitted,

By: s/ C. Daniel Pruitt
Bar # 66497
Attorney for Respondent
300 Pettigru Street
Greenville, SC 29601
(864) 232-4273
danlaw@bellsouth.net

Greenville, South Carolina

September 27, 2022

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Lindsay Harrison

SC Court of Appeals

From: Lindsay Harrison
Sent: Tuesday, September 27, 2022 12:22 PM
To: RHines@ycrlaw.com; Davis, Jay
Cc: Dan Pruitt
Subject: Stroud v. THI (Appellate Case No. 2022-000398)
Attachments: Motion for Extension of Time to File Serve Initial Brief.pdf

Good afternoon,

Please find attached Respondent's Motion for Extension of Time to File/Serve her initial Brief in the above-captioned matter. The Motion will be filed today.

Should you have any questions or concerns, please do not hesitate to contact my office.

Kindest regards,



LINDSAY C. HARRISON
PARALEGAL TO C. DANIEL PRUITT

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