

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

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**Oct 17 2022**

**S.C. SUPREME COURT**

Appeal from Greenville County  
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

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Case No. 2019-CP-23-00473  
Court of Appeals Case No. 2022-001406  
Unpublished Opinion No. 2022-UP-203 (S.C. Ct. App. Filed May 18, 2022)

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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, Petitioners.

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**SECOND MOTION FOR EXTENSION OF TIME  
TO SERVE/FILE PETITION FOR A WRIT OF CERTIORARI**

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*Attorneys for Petitioners*

NOW COME Petitioners, 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, on the grounds stated below, pursuant to Rule 263(b), SCACR, as well as the Court's order of July 16, 2014, regarding Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals, and hereby move for an extension of ten (10) days' time to file/serve their petition to this Court for issuance of a writ of certiorari to the Court of Appeals to review its decision in this matter.

Presently, by order of this Court filed October 10, 2022, the deadline for Petitioners to file/serve a petition to this Court for a writ of certiorari is October 17, 2022. Due to other time commitments, both work- and non-work-related, the undersigned counsel for Petitioners requests ten (10) additional days, beyond today's date, to prepare Petitioners' petition seeking this Court's review of the Court of Appeals' decision via writ of certiorari, and the undersigned submits that there is good cause to allow the requested dispensation: It is in furtherance of the interests of justice; it will not work any undue prejudice upon any other party; and it is consistent with the extension protocol established by the Court's aforementioned order of July 16, 2014.

WHEREFORE, Petitioners respectfully request that this Honorable Court grant them an extension of ten (10) days' time to file/serve their petition for a writ of certiorari. With the extension requested herein, the new deadline for filing/serving the petition for writ of certiorari would be October 27, 2022, according to the undersigned's calculations. Further, Petitioners respectfully request that the Court hold the present deadline in abeyance until it acts upon this motion.

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: *s/Russell G. Hines*  
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October 17, 2022