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**Dec 02 2022**

**SC Court of Appeals**

**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 REPLY BRIEF**

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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)  
25 Calhoun Street, Suite 400  
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P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Appellants*

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 ten (10) days' additional time to file/serve their initial reply brief.

Presently, in accordance with Rule 208(a)(3), the deadline for Appellants' initial reply brief is Friday, December 2, 2022. On account of work-related and other time commitments, Appellants respectfully request this deadline be extended by 10 days. Respectfully, Appellants believe 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 extension of 10 days' time to file/serve their initial reply brief. With the extension requested herein, the new deadline for filing/serving their initial reply brief would be December 12, 2022, according to the undersigned's calculations. Further, Appellants respectfully request the Court hold their present initial-reply-briefing 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 Reply Brief,  
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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*Attorneys for Appellants*

Charleston, South Carolina

December 2, 2022

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THI of South Carolina, LLC,

Appellants.

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**PROOF OF SERVICE**

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CLEMENT RIVERS, LLP  
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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 REPLY BRIEF** was served on Respondent on December 2, 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

December 2, 2022

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Friday, December 2, 2022 11:14 AM  
**To:** 'dan@danpruittlaw.com'; 'Lindsay@danpruittlaw.com'; 'danlaw@bellsouth.net'  
**Cc:** Hines, Russell; Justman, Aimee  
**Subject:** Stroud v. THI // Appellate Case No. 2022-000398 (CR 191015)  
**Attachments:** Mtn for Ext to File-Serve Initial Reply Brief.pdf

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

Thank you,

Pollyana Bell  
Project Assistant  
Commercial Litigation Practice Group  
Phone:(843)720-5488 | Fax:(843)579-1369



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