

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

RECEIVED

Dec 12 2022

SC 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

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.

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

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
Charleston, South Carolina 29401
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 a second extension of ten (10) days' additional time to file/serve their initial reply brief.

Presently, by order of this Court filed December 2, 2022, the deadline for Appellants' initial reply brief is today, December 12, 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 22, 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 Second 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)
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
Charleston, South Carolina 29401
P.O. Box 993 (29402)
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Charleston, South Carolina

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PROOF OF SERVICE

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

Charleston, South Carolina 29401

P.O. Box 993 (29402)

(843) 720-5488

Attorneys for Appellants

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that Appellants' **SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF** was served on Respondent on December 12, 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

December 12, 2022

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Monday, December 12, 2022 1:30 PM
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: Second Mtn for Ext for Appellants' Initial Reply Brief.pdf

Enclosed please find Appellants' Second 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



CLEMENT RIVERS, LLP
25 Calhoun Street • Suite 600 • Charleston, SC 29401
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