

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

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May 15 2023

SC Court of Appeals

Appeal from Spartanburg County
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

Case No. 2018-CP-42-04405
Court of Appeals Case No. 2019-001731
Opinion No. 5963 (S.C. Ct. App. Filed January 25, 2023)

The Estate of Mary Solesbee, by her personal
representative, Connie Bayne,

Respondent,

v.

Fundamental Clinical and Operational Services, LLC;
Fundamental Administrative Services, LLC; THI of
South Carolina at Magnolia Manor-Inman, LLC d/b/a
Magnolia Manor-Inman; Inpatient Consultants of North
Carolina, P.C.; and Angela Brown, ACNP,

Defendants,

Of which Fundamental Clinical and Operational
Services, LLC; Fundamental Administrative Services,
LLC; and THI of South Carolina at Magnolia Manor-
Inman, LLC d/b/a Magnolia Manor-Inman are the

Petitioners.

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

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Attorneys for Petitioners

NOW COME Petitioners, Fundamental Clinical and Operational Services, LLC; Fundamental Administrative Services, LLC; and THI of South Carolina at Magnolia Manor-Inman, LLC d/b/a Magnolia Manor-Inman, 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.

The Court of Appeals denied Petitioners' timely petition for rehearing on April 14, 2023, making the deadline to file/serve a petition to this Court for a writ of certiorari today, Monday, May 15, 2023, pursuant to Rule 242(c), SCACR. 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 Thursday, May 25, 2023, 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

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