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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

May 19 2023

SC Court of Appeals

Appeal from Spartanburg County
Court of Common Pleas

R. Keith Kelly, Circuit Court Judge

Appellate Case No. 2022-001059
Case No. 2019-CP-42-03708 and
Case No. 2019-CP-42-03709

Kenneth Pace,
Individually and as Personal Representative of
the Estate of Earl E. Pace,

Respondent,

v.

Lake Emory Post Acute Care; THI of South Carolina at Camp Care,
LLC; THI of South Carolina, LLC; THI of Baltimore, Inc.; Fundamental
Administrative Services, LLC; Fundamental Clinical and Operational
Services, LLC; Fundamental Clinical Consulting, LLC; Fundamental
Long Term Care Holdings, LLC; and Kerry L. Wheeler, DO,

Defendants,

Of which Lake Emory Post Acute Care; THI of South Carolina at Camp
Care, LLC; THI of South Carolina, LLC; THI of Baltimore, Inc.;
Fundamental Administrative Services, LLC; Fundamental Clinical and
Operational Services, LLC; and Fundamental Long Term Care
Holdings, LLC, are

Appellants.

PROOF OF SERVICE

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I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that Appellants' **MOTION FOR EXTENSION OF TIME TO FILE/SERVE APPELLANTS' INITIAL REPLY BRIEF** was served on Respondent on May 19, 2023, by emailing (see attached) a copy of the same to Respondent's counsel of record:

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Respectfully submitted,

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May 19, 2023

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Friday, May 19, 2023 11:58 AM
To: 'Anthony Harbin'; 'jennifer@harbinlaw.com'; 'skellner@harbinlaw.com'
Cc: Hines, Russell; Justman, Aimee
Subject: Pace v. Lake Emory; Appellate Case No. 2022-001059 (CR 190600)
Attachments: Mtn for Ext-Appellants' 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
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