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May 24 2023

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Spartanburg County
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

Case No. 2018-CP-42-04405

Appellate No. 2023-000777

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.

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

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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 a second 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 May 15, 2023, the deadline to file/serve a petition to this Court for a writ of certiorari is May 25, 2023. Due to other time commitments, both work- and non-work-related, the undersigned counsel for Petitioners requests ten (10) additional days 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 a second 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 June 5, 2023, according to the undersigned's calculations. Further, Petitioners respectfully request the Court hold the present deadline in abeyance until it acts upon this motion.

Respectfully submitted,
CLEMENT RIVERS, LLP

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