

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Aug 14 2023

Appeal from Spartanburg County  
Court of Common Pleas

SC Court of Appeals

J. Derham Cole, Circuit Court Judge

Appellate Case No. 2023-000432  
Case No. 2021-CP-42-03701

The Estate of Jo Eva Rice, deceased,  
by her Personal Representative Sonya Lovett,

Respondent,

v.

Fundamental Clinical and Operational Services, LLC;  
Fundamental Administrative Services, LLC; and  
THI of South Carolina at Magnolia Place–Spartanburg,  
a/k/a Physical Rehab and Wellness of Spartanburg,

Appellants,

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

CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
James D. Gandy, III (SC Bar No. 11925)  
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*Attorneys for Appellants*

NOW COME Appellants, Fundamental Clinical and Operational Services, LLC, Fundamental Administrative Services, LLC, and THI of South Carolina at Magnolia Place–Spartanburg, a/k/a Physical Rehab and Wellness of Spartanburg, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for a second extension of thirty (30) days’ additional time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed July 28, 2023, the deadline for Appellants’ initial brief and designation of matter is August 14, 2023. On account of work-related and other time commitments, Appellants respectfully request this deadline be extended by 30 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 additional extension of 30 days’ time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving their initial brief and designation of matter would be September 13, 2023, according to the undersigned’s calculations. Further, Appellants respectfully request the Court hold their present initial-briefing/designation-of-matter 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 Brief  
of Appellants, Appellate Case No. 2023-000432]*

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
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August 14, 2023