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**Aug 16 2023**

**SC Court of Appeals**

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

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Appeal from Spartanburg County  
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

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Case No. 2018-CP-42-03421  
Appellate Case No. 2020-001146

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Armando J. Acevedo,  
through his Attorney-in-Fact, Marianne Acevedo,

Respondent,

v.

Hunt Valley Holdings, LLC;  
THI of South Carolina, LLC; and  
THI of South Carolina at Camp Care, LLC,  
d/b/a Lake Emory Post Acute Care,

Appellants.

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**MOTION FOR EXTENSION OF TIME  
TO PETITION FOR REHEARING**

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CLEMENT RIVERS, LLP  
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*Attorneys for Appellants*

COME NOW Appellants, Hunt Valley Holdings, LLC, THI of South Carolina, LLC, and THI of South Carolina at Camp Care, LLC, d/b/a Lake Emory Post Acute Care, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an extension of fifteen (15) days' additional time to file/serve a petition for rehearing of this matter, which the Court decided via opinion filed August 2, 2023. *See Acevedo v. Hunt Valley Holdings, LLC, et al.*, Unpublished Op. No. 2023-UP-281.

Rule 221(a), SCACR, provides, "Petitions for rehearing must be actually received by the appellate court no later than fifteen (15) days after the filing of the opinion, order, judgment, or decree of the court." Based on the August 2, 2023, filing of the Court's opinion in this case, the present deadline to petition for rehearing is the close of business August 17, 2023, which, in accordance with Rule 263(a), SCACR (regarding computation of time), is the 15<sup>th</sup> day after the opinion's filing. Because of work-related and other time commitments, the undersigned counsel for Appellants requests the Court's allowance of fifteen (15) days' additional time to petition for rehearing.

Respectfully, the undersigned submits there is good cause for the Court to grant the relief requested herein, as it is, under the circumstances, a reasonable dispensation, timely sought, consistent with the interests of justice, posing no threat of undue prejudice to any other party.

WHEREFORE, Appellants request that the Court grant them an extension of 15 days' time to petition for rehearing. By the undersigned's calculations, the grant of this relief would make the new deadline to petition for rehearing September 1, 2023. ADDITIONALLY, for the same reasons set forth in support of the within request for an extension of time, Appellants request the Court hold the present deadline for petitioning for rehearing in abeyance until the Court acts on this motion.

*[Signature page for Motion for Extension of Time to Petition for Rehearing,  
Appellate Case No. 2020-001146]*

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
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Charleston, South Carolina

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Appellants.

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**PROOF OF SERVICE**

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*Attorneys for Appellants*

I, Russell G. Hines, of Clement Rivers, LLP, counsel for Appellants, do hereby certify that the **MOTION FOR EXTENSION OF TIME TO PETITION FOR REHEARING** was served on all other parties to this matter on August 16, 2023, via email (see attached) to Respondent's following counsel of record:

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Respectfully submitted,  
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*Attorneys for Appellants*

Charleston, South Carolina

August 16, 2023

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Wednesday, August 16, 2023 1:51 PM  
**To:** 'atty@gpoliakoff.com'; 'rmullmanjr@gmail.com'; 'jwaelde@gpoliakoff.com';  
'pknie@knielaw.com'; 'jordan@mcgowanhood.com'  
**Cc:** Hines, Russell; Justman, Aimee  
**Subject:** Acevedo v. Hunt Valley Holdings; Appellate Case No. 2020-001146 (CR 200085)  
**Attachments:** 1st Motion for Extension - Petition for Rehearing.pdf

Enclosed please find Appellants' Motion for Extension of Time to Petition for Rehearing for service upon you in the above-referenced matter.

Thank you,

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