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SC Court of Appeals

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

Appeal from Spartanburg County
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

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

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.

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

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
Russell G. Hines (SC Bar No. 72100)
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(843) 720-5488

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.

Presently, by order of this Court filed August 24, 2023, the deadline to file/serve a petition for rehearing is today, September 1, 2023. 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 18, 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 Second 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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Attorneys for Appellants

Charleston, South Carolina

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PROOF OF SERVICE

CLEMENT RIVERS, LLP
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Attorneys for Appellants

I, Russell G. Hines, of Clement Rivers, LLP, counsel for Appellants, do hereby certify that the **SECOND MOTION FOR EXTENSION OF TIME TO PETITION FOR REHEARING** was served on all other parties to this matter on September 1, 2023, via email (see attached) to Respondent's following counsel of record:

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Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
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Attorneys for Appellants

Charleston, South Carolina

September 1, 2023

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Friday, September 1, 2023 10:17 AM
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 180125)
Attachments: 2nd Motion for Extension - Petition for Rehearing.pdf

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

Thank you,

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