

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

Appeal from Horry County
Court of Common Pleas

J. Mark Hayes, II, Circuit Court Judge

Appellate Case No. 2020-001107
Case No. 2018-CP-42-03447

Estate of Barbara Owens, by and through her Personal
Representative, Mary Jane McCraw, Individually and on behalf of
Statutory Beneficiaries,

Respondent,

v.

Fundamental Clinical and Operational Services, LLC; Fundamental
Administrative Services, LLC; THI of South Carolina, LLC; THI Of
South Carolina at Spartanburg, LLC d/b/a Magnolia Manor-
Spartanburg,

Petitioners.

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

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Attorneys for Petitioners

NOW COME Petitioners, Fundamental Clinical and Operational Services, LLC, Fundamental Administrative Services, LLC, THI of South Carolina, LLC, and THI Of South Carolina at Spartanburg, LLC d/b/a Magnolia Manor-Spartanburg, 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 an 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, based on the Court of Appeals' order denying the petition for rehearing dated September 15, 2023, and pursuant to Rule 242(c), SCACR, the deadline for the petition for writ of certiorari is October 16, 2023. Due to other time commitments, both work- and non-work-related, the undersigned counsel for Petitioners requests ten (10) additional days, beyond today's date, to prepare Petitioners' petition seeking this Court's review of the Court of Appeals' decision via writ of certiorari, and the undersigned submits 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 this Honorable Court grant

them an extension of ten (10) days' time to file/serve their petition for writ of certiorari. With the extension requested herein, the new deadline for filing/serving their petition for writ of certiorari would be October 26, 2023, according to the undersigned's calculations. Further, Petitioners respectfully request the Court hold this present deadline in abeyance until it acts upon this motion.

*[Signature page for Motion for Extension of Time to Serve/File
Petition for Writ of Certiorari, Appellate Case No. 2020-001107]*

Respectfully submitted,

CLEMENT RIVERS, LLP

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October 13, 2023