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Oct 20 2023

SC Court of Appeals

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

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,

Petitioners.

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

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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P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Petitioners

NOW COME Petitioners, 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, 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, by order of this Court dated September 22, 2023, the deadline for the petition for writ of certiorari is October 23, 2023. Due to other time commitments, both work- and non-work-related, the undersigned counsel for Petitioner requests ten (10) additional days, beyond today's date, to prepare Petitioner's 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 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 November 2, 2023, according to the undersigned's calculations. Further, Petitioners respectfully request that the Court hold his 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. 2020-001146]*

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Stephen L. Brown (SC Bar No. 66468)
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Charleston, South Carolina

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v.

Hunt Valley Holdings, LLC;
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Petitioners.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
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Attorneys for Petitioners

I, Russell G. Hines, of Clement Rivers, LLP, counsel for Petitioners, do hereby certify that the **MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI** was served on all other parties to this matter on October 20, 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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Charleston, South Carolina

October 20, 2023

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Friday, October 20, 2023 12:08 PM
To: 'atty@gpoliakoff.com'; 'rmullmanjr@gmail.com'; 'jwaelde@gpoliakoff.com'; 'pknie@knielaw.com'; 'jordan@mcgowanhood.com'
Cc: Justman, Aimee; Hines, Russell
Subject: Acevedo v. Hunt Valley Holdings; Appellate Case No. 2020-001146 (CR 180125)
Attachments: Motion for Extension - Petition for Writ of Certiorari.pdf

Enclosed please find Petitioners' Motion for Extension of Time to Serve/File Petition for Writ of Certiorari for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell
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