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**Dec 11 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

Grace Gilchrist Knie, Circuit Court Judge

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Case No. 2022-CP-42-02595  
Appellate Case No. 2023-001371

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Steven McCarson,  
as Personal Representative of the Estate of Louie Arches,

Respondent,

v.

THI of South Carolina at Magnolia Manor–Inman, LLC  
d/b/a Magnolia Manor–Inman, THI of South Carolina at Inman, LLC,  
THI of South Carolina, LLC, Hunt Valley Holdings, LLC,  
Fundamental Administrative Services, LLC,  
Fundamental Clinical And Operational Services, LLC,  
THI of Baltimore, LLC, and James H. Mack,

Appellants.

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

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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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(843) 720-5488

*Attorneys for Appellants*

COME NOW Appellants THI of South Carolina at Magnolia Manor–Inman, LLC d/b/a Magnolia Manor–Inman, THI of South Carolina at Inman, LLC, THI of South Carolina, LLC, Hunt Valley Holdings, LLC, Fundamental Administrative Services, LLC, Fundamental Clinical And Operational Services, LLC, THI of Baltimore, LLC, and James H. Mack, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an 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.

Pursuant to Rule 208(a)(1), the deadline for Appellants’ initial brief and designation of matter is December 12, 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 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 January 11, 2024, according to the undersigned’s calculations. Further, Appellants respectfully request the Court hold the present deadline in abeyance until it acts upon this motion.

*[Signature page for Motion for Extension of Time to File/Serve Initial Brief of Appellants, Appellate No. 2023-001371]*

Respectfully submitted,  
CLEMENT RIVERS, LLP

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

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Fundamental Administrative Services, LLC,  
Fundamental Clinical And Operational Services, LLC,  
THI of Baltimore, LLC, and James H. Mack,

Appellants.

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**PROOF OF SERVICE**

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CLEMENT RIVERS, LLP  
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James D. Gandy, III (SC Bar No. 11925)  
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*Attorneys for Appellants*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that Appellants' **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANTS** was served on Respondent on December 11, 2023, by emailing (see attached email) a copy of the same to his counsel of record:

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*-and-*

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*Attorneys for Respondent*

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Russell G. Hines (SC Bar No. 72100)  
*Attorneys for Appellants*

Charleston, South Carolina

December 11, 2023

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Monday, December 11, 2023 3:46 PM  
**To:** lcope@parkerlawgroupsc.com; jayparker@parkerlawgroupsc.com; jwalters@kcw-law.com; ccartier@parkerlawgroupsc.com  
**Cc:** Justman, Aimee; Hines, Russell  
**Subject:** McCarson v. THI; Appellate Case No. 2023-001371 (CR 220432)  
**Attachments:** 1st Motion for extension - Initial Brief.pdf

Enclosed please find Appellants' Motion for Extension of Time to File/Serve their Initial Brief for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell  
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