

**RECEIVED**

**Mar 14 2024**

**SC Court of Appeals**

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

---

Appeal from Spartanburg County  
Court of Common Pleas  
Grace Gilchrist Knie, Circuit Court Judge

---

Case No. 2020-CP-42-03593  
Court of Appeals Case No. 2021-000707  
Supreme Court Case No. 2024-000304

---

Trina Dawkins,  
as Personal Representative of the Estate of William Dawkins,

Respondent,

v.

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

Petitioners.

---

**SECOND 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)  
James D. Gandy, III (SC Bar No. 11925)  
Russell G. Hines (SC Bar No. 72100)  
T. Ashton Phillips, III (SC Bar No. 104227)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Petitioners*

COME NOW Appellants, Fundamental Clinical and Operational Services, LLC; Fundamental Administrative Services, LLC; THI of South Carolina, LLC; THI of South Carolina at Spartanburg, LLC; THI of South Carolina at Magnolia Manor-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, by order of this Court filed March 6, 2024, the deadline for the petition for writ of certiorari is March 18, 2024. Due to other time commitments, both work- and non-work-related, the undersigned counsel for Petitioners requests ten (10) additional days, beyond March 18, 2024, to prepare Petitioners' 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 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 the petition for writ of certiorari would be March 28, 2024, according to the undersigned's calculations. Further, Petitioners respectfully request that the Court hold the present deadline in abeyance until it acts upon this motion.

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)  
Russell G. Hines (SC Bar No. 72100)  
T. Ashton Phillips, III (SC Bar No. 104227)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488  
*Attorneys for Petitioners*

Charleston, South Carolina

March 14, 2024

**RECEIVED**

**Mar 14 2024**

**SC Court of Appeals**

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

---

Appeal from Spartanburg County  
Court of Common Pleas  
Grace Gilchrist Knie, Circuit Court Judge

---

Case No. 2020-CP-42-03593  
Court of Appeals Case No. 2021-000707  
Supreme Court Case No. 2024-000304

---

Trina Dawkins,  
as Personal Representative of the Estate of William Dawkins,

Respondent,

v.

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

Petitioners.

---

**PROOF OF SERVICE**

---

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)  
Russell G. Hines (SC Bar No. 72100)  
T. Ashton Phillips, III (SC Bar No. 104227)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Petitioners*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioners, hereby certify that the foregoing **SECOND MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI** was served on Respondent on March 14, 2024, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

William A. Jordan III, Esquire  
[william@jordanlawcenter.com](mailto:william@jordanlawcenter.com)  
JORDAN LAW CENTER, LLC  
622 Wade Hampton Boulevard  
Greenville, SC 29609  
*Attorney for Respondent*

I also certify that Petitioners' **SECOND MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI** and **PROOF OF SERVICE** were filed with the South Carolina Court of Appeals on March 14, 2024, via email (see attached) to [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org).

Respectfully submitted,  
CLEMENT RIVERS, LLP

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

Charleston, South Carolina

March 14, 2024

**From:** [Bell, Pollyana \(Polly\)](#)  
**To:** ["william@jordanlawcenter.com"](mailto:william@jordanlawcenter.com)  
**Cc:** [Hines, Russell](#); [Justman, Aimee](#)  
**Subject:** Dawkins v. Fundamental Clinical; Sup. Ct. Case No. 2024-000304; Ct. App. Case No. 2021-000707 (CR 200461)  
**Date:** Thursday, March 14, 2024 5:46:39 PM  
**Attachments:** [2nd Motion for Extension - Petition for Writ of Certiorari.pdf](#)  
[image001.png](#)

---

Enclosed please find Petitioners' Second 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  
Project Assistant  
Commercial Litigation Practice Group  
Phone:(843)720-5488 | Fax:(843)579-1369



**CLEMENT RIVERS, LLP**  
25 Calhoun Street • Suite 400 • Charleston, SC 29401  
yclaw.com