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Mar 21 2024

SC Court of Appeals

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

Appeal from Spartanburg County
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

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

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.

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

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 ten (10) days’ additional time to file/serve their initial reply brief.

Pursuant to Rule 208(a)(3), the present deadline for Appellants’ initial reply brief is March 22, 2024. On account of work-related and other time commitments, Appellants respectfully request this deadline be extended 10 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 10 days’ time to file/serve their initial brief. With the extension requested herein, the new deadline for filing/serving their initial brief and designation of matter would be April 1, 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 on next page]

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

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
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Appellants.

PROOF OF SERVICE

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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 REPLY BRIEF OF APPELLANTS** was served on Respondent on March 21, 2024, by emailing (see attached email) a copy of the same to his counsel of record:

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Attorneys for Respondent

Respectfully submitted,
CLEMENT RIVERS, LLP

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

March 21, 2024

From: [Bell, Pollyana \(Polly\)](#)
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Subject: McCarson v. THI; Appellate Case No. 2023-001371 (CR 220432)
Date: Thursday, March 21, 2024 12:09:03 PM
Attachments: [Motion for extension - initial reply brief.pdf](#)
[image001.png](#)

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

Thank you,

Pollyana Bell
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