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**Apr 19 2024**

**SC Court of Appeals**

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

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Appeal from Greenville County  
Court of Common Pleas

Alex Kinlaw, Jr., Circuit Court Judge

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Appellate Case No. 2022-000398  
Case No. 2020-CP-23-01728

Debbie Stroud,  
Guardian ad Litem for James C. Stroud,

Respondent,

v.

THI of South Carolina at Greenville, LLC  
d/b/a Magnolia Manor-Greenville,  
THI of Baltimore, Inc., and  
THI of South Carolina, LLC,

Appellants.

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**SECOND MOTION FOR EXTENSION  
OF TIME TO PETITION FOR REHEARING**

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CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
Matthew O. Riddle (SC Bar No. 76650)  
Russell G. Hines (SC Bar No. 72100)  
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P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Appellants*

COME NOW Appellants THI of South Carolina at Greenville, LLC d/b/a Magnolia Manor-Greenville, THI of Baltimore, Inc., and THI of South Carolina, LLC, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an extension of fifteen (15) days' additional time to file/serve a petition for rehearing of this matter, which the Court decided via opinion filed March 20, 2024. *See Debbie Stroud v. THI of South Carolina at Greenville, LLC*, Unpublished Op. No. 2024-UP-084.

Presently, by order of this Court dated April 8, 2024, the deadline to petition for rehearing is today, Friday, April 19, 2024. Because of work-related and other time commitments, the undersigned counsel for Appellants request the Court's allowance of fifteen (15) days' additional time to petition for rehearing.

Respectfully, the undersigned submits there is good cause for the Court to grant the relief requested herein, as it is, under the circumstances, a reasonable dispensation, timely sought, consistent with the interests of justice, posing no threat of undue prejudice to any other party.

WHEREFORE, Appellants request the Court grant them an extension of 15 days' time to petition for rehearing. By the undersigned's calculations, the grant of this relief would make the new deadline to petition for rehearing May 6, 2024. ADDITIONALLY, for the same reasons set forth in support of the within request for

an extension of time, Appellants request the Court hold the present deadline for petitioning for rehearing in abeyance until the Court acts on this motion.

*[Signature page for Second Motion for Extension of Time to Petition for Rehearing, Appeal No. 2022-000398]*

Respectfully submitted,  
CLEMENT RIVERS, LLP

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

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THI of South Carolina, LLC,

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**PROOF OF SERVICE**

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CLEMENT RIVERS, LLP  
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*Attorneys for Appellants*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that Appellants' **SECOND MOTION FOR EXTENSION OF TIME TO PETITION FOR REHEARING** was served on Respondent on April 19, 2024, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

C. Daniel Pruitt, Esquire  
[danlaw@bellsouth.net](mailto:danlaw@bellsouth.net)  
300 Pettigru Street  
Greenville, SC 29601  
*Attorney 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

April 19, 2024

**From:** [Bell, Pollyana \(Polly\)](#)  
**To:** [Dan Pruitt](#)  
**Cc:** [Hines, Russell](#); [Justman, Aimee](#)  
**Subject:** Stroud v. THI; Appellate Case No. 2022-000398 (CR 191015)  
**Date:** Friday, April 19, 2024 1:43:03 PM  
**Attachments:** [image001.png](#)  
[2nd Motion for extension - petition for rehearing.pdf](#)

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Enclosed please find Appellants' Motion for Extension of Time to Petition for Rehearing for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell  
Project Assistant  
Commercial Litigation Practice Group  
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