

RECEIVED

May 01 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

Appellate Case No. 2023-001612
Case No. 2022-CP-42-01163

Timothy Hutley, Guardian for Jane Doe,

Respondent,

v.

THI of South Carolina at Magnolia Manor Inman, LLC,
THI of Baltimore, Inc., THI of South Carolina, LLC,
Hunt Valley Holdings, LLC, THI of South Carolina at
Inman, LLC, Murray Forman, and Kathy Scroggs, Individually,

Defendants.

Of which THI of South Carolina at Magnolia Manor Inman, LLC,
THI of Baltimore, Inc., THI of South Carolina, LLC, and Hunt
Valley Holdings, LLC, are the

Appellants.

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

The Dan Pruitt Law Firm
C. Daniel Pruitt (SC Bar No. 66497)
300 Pettigru Street
Greenville, SC 29601
864-232-4273

Attorney[s] for Respondent

NOW COME[S] Respondent, by and through his undersigned counsel, pursuant to Rule 263(b), SCACR, and hereby move[s] for an extension of thirty (30) days additional time to file/serve his initial brief and corresponding designation of matter to be included in the record on appeal.

The current deadline for the initial brief and designation is April 29, 2024. Because of work-related and other time commitments, Respondent respectfully requests that this deadline be extended by 30 days, through May 29, 2024. Respectfully, Respondent believes that this relief is consistent with the interests of justice and will not result in any undue prejudice to any party.

WHEREFORE, Respondent moves this Honorable Court to grant him an extension of 30 days' time to file/serve her initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline would be May 29, 2024. According to the undersigned's calculations. Further, Respondent respectfully requests that the Court hold his present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

(signature page to follow)

Respectfully submitted,

By: s/ C. Daniel Pruitt
Bar # 66497
Attorney for Respondent
300 Pettigru Street
Greenville, SC 29601
(864) 232-4273
dan@danpruittlaw.com

Greenville, South Carolina

May 1, 2024

RECEIVED

May 01 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

Appellate Case No. 2023-001612
Case No. 2022-CP-42-01163

Timothy Hutley, Guardian for Jane Doe,

Respondent,

v.

THI of South Carolina at Magnolia Manor Inman, LLC,
THI of Baltimore, Inc., THI of South Carolina, LLC,
Hunt Valley Holdings, LLC, THI of South Carolina at
Inman, LLC, Murray Forman, and Kathy Scroggs, Individually,

Defendants.

Of which THI of South Carolina at Magnolia Manor Inman, LLC,
THI of Baltimore, Inc., THI of South Carolina, LLC, and Hunt
Valley Holdings, LLC, are the

Appellants.

PROOF OF SERVICE

The Dan Pruitt Law Firm
C. Daniel Pruitt (SC Bar No. 66497)

300 Pettigru Street
Greenville, SC 29601
864-232-4273

Attorney for Respondent

I, **C. Daniel Pruitt**, of the Dan Pruitt Law Firm, attorney for the Respondent, hereby certify that Respondent's MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF RESPONDENT was served on Appellants' on May 1, 2024, by emailing (see attached email) a copy of the same to Appellants' counsel of record:

Russell G. Hines, Esquire (rhines@ycrlaw.com)
D. Jay Davis, Jr., Esquire (jdavis@ycrlaw.com)
James D. Gandy, III, Esquire (tgandy@ycrlaw.com)
Gaillard T. Dotterer, III, Esquire (gdotterer@ycrlaw.com)
Stephen L. Brown, Esquire (sbrown@ycrlaw.com)

CLEMENT RIVERS, LLP
25 Calhoun Street, Suite 400
Charleston, SC 29401

Attorneys for Appellants

Respectfully submitted,

By: s/ C. Daniel Pruitt
Bar # 66497
Attorney for Respondent
300 Pettigru Street
Greenville, SC 29601
(864) 232-4273
dan@danpruittlaw.com

Greenville, South Carolina
May 1, 2024

Lindsay Harrison

From: Lindsay Harrison
Sent: Wednesday, May 1, 2024 9:56 AM
To: rhines@ycrlaw.com; Davis, Jay; Gandy, III, James D. (Tripp); Dotterer III, Gaillard T. (Gilly); sbrown@ycrlaw.com
Cc: Dan Pruitt; Wakeham, Rebecca (Becky)
Subject: Hutley v. THI; Appellate Case No. 2023-001612
Attachments: Resp Motion for Extension of Time to file initial brief (due 5-29-24).pdf

Good morning,

Please find attached Respondent's Motion for Extension of Time to File/Serve his Initial Brief in the above-captioned matter. The Motion will be filed today.

Should you have any questions or concerns, please do not hesitate to contact my office.

Kindest regards,



LINDSAY C. HARRISON
PARALEGAL TO C. DANIEL PRUITT

Phone: 864-232-4273
Facsimile: 864-232-7781
Email: lindsay@danpruittlaw.com

300 Pettigru Street
Greenville, South Carolina 29601

www.danpruittlawfirm.com

CONFIDENTIALITY NOTICE: This e-mail has been sent by a law firm, and the contents may contain confidential, privileged, or otherwise legally protected information. If you are not the intended recipient, you must not read, retain, or disseminate this message. Instead, you must delete this message immediately. It is the intent of the sender and the recipient(s) to preserve the attorney-client privilege, and any unintentional publication of this e-mail is not a waiver of such.