

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

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**RECEIVED**

**Jun 20 2024**

Appeal from Spartanburg County  
Court of Common Pleas

S.C. SUPREME COURT

J. Derham Cole, Circuit Court Judge

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Case No. 2021-CP-42-03701  
Court of Appeals Case No. 2023-000432

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The Estate of Jo Eva Rice, deceased,  
by her Personal Representative Sonya Lovett,

Respondent,

v.

Fundamental Clinical and Operational Services, LLC;  
Fundamental Administrative Services, LLC; and  
THI of South Carolina at Magnolia Place–Spartanburg,  
a/k/a Physical Rehab and Wellness of Spartanburg,

Petitioners,

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**MOTION FOR EXTENSION OF TIME TO  
SERVE/FILE PETITION FOR WRIT OF CERTIORARI**

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D. Jay Davis, Jr. (SC Bar No. 12084)  
James D. Gandy, III (SC Bar No. 11925)  
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*Attorneys for Petitioners*

NOW COME Petitioners Fundamental Clinical and Operational Services, LLC, Fundamental Administrative Services, LLC, and THI of South Carolina at Magnolia Place–Spartanburg, a/k/a Physical Rehab and Wellness of Spartanburg, by and through their undersigned counsel, 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.

Pursuant to Rule 242(c), SCACR, the present deadline for the petition for writ of certiorari is today, June 20, 2024. Due to other time commitments, both work- and non-work-related, the undersigned counsel for Petitioners request ten (10) additional days, beyond today’s date, 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 July 1, 2024, according to the undersigned's calculations. Further, Petitioners respectfully request the Court hold this present deadline in abeyance until it acts upon this motion.

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: *s/Russell G. Hines*  
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June 20, 2024