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Jun 20 2024

SC Court of Appeals

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

Appeal from Greenville County
Court of Common Pleas

Alex Kinlaw, Jr., Circuit Court Judge

Case No. 2020-CP-23-01728
Court of Appeals Case No. 2022-000398

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,

Petitioners.

**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)
Matthew O. Riddle (SC Bar No. 76650)
Russell G. Hines (SC Bar No. 72100)
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(843) 720-5488

Attorneys for Petitioners

NOW COME Petitioners 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, 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.

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 the present deadline in abeyance until it acts upon this motion.

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
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Attorneys for Petitioners

Charleston, South Carolina

June 20, 2024

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Court of Common Pleas

Alex Kinlaw, Jr., Circuit Court Judge

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
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Petitioners.

PROOF OF SERVICE

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Attorneys for Petitioners

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioners, hereby certify that Petitioners' **MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI** was served on Respondent on June 20, 2024, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

C. Daniel Pruitt, Esquire
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 Petitioners

Charleston, South Carolina

June 20, 2024

From: [Bell, Pollyana \(Polly\)](#)
To: ["Dan Pruitt"; Dan Pruitt](#)
Cc: [Justman, Aimee; Hines, Russell](#)
Subject: Stroud v. THI; Ct. App. Case No. 2022-000398 (CR 191015)
Date: Thursday, June 20, 2024 11:18:18 AM
Attachments: [image001.png](#)
[1st Motion for Extension - Petition for Writ of Cert.pdf](#)

Enclosed please find Petitioners' Motion for Extension of Time to Serve/File their Petition for Writ of Certiorari for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell
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