

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

Appeal from Spartanburg County
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

Case No. 2021-CP-42-03701
Court of Appeals Case No. 2023-000432
Supreme Court Case No. 2024-001031

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,

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

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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 a second 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.

Presently, by order of this Court dated June 24, 2024, the deadline for the petition for writ of certiorari is Monday, July 1, 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 11, 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 28, 2024