

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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Aug 12 2024

SC Court of Appeals

Appeal from Spartanburg County
Court of Common Pleas
Grace Gilchrist Knie, Circuit Court Judge

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

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.

**CONSENT MOTION (1) TO REVISE APPELLANTS' BRIEF
AND (2) FOR EXTENSION OF TIME TO FILE/SERVE FINAL BRIEFS**

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Attorneys for Appellants

COME NOW Appellants, THI of South Carolina at Magnolia Manor Inman, LLC, THI of Baltimore, Inc., THI of South Carolina, LLC, and Hunt Valley Holdings, LLC, by and through their undersigned counsel, joined by and with the consent of Respondent, Timothy Hutley, Guardian for Jane Doe, by and through his undersigned counsel, and hereby move this Honorable Court as follows.

The Record on Appeal was filed/served on July 22, 2024, making the parties' final briefs due to be filed/served today, August 12, 2024, pursuant to Rule 211(a), SCACR. Under Rule 211(b), final briefs are required to be identical to initial briefs but for certain exceptions. In the process of preparing the Final Brief of Appellants, the undersigned counsel for Appellants became aware of an error in the Initial Brief of Appellants that he wishes to correct. A footnote was inadvertently left in the Initial Brief of Appellants that should have been omitted, because it simply does not pertain to this case. Upon noticing the error, the undersigned counsel for Appellants consulted with the undersigned counsel for Respondent, who kindly consents to the footnote being omitted from the Final Brief of Appellants.

WHEREFORE, with the parties all in agreement that the relief sought herein is supported by good cause, Appellants, joined by and with the express consent of Respondent, respectfully request (1) leave for Appellants to omit from the Final Brief of Appellants the aforementioned footnote that was inadvertently included in the initial Brief of Appellants and (2) an extension of time for *all parties* to file/serve their final

briefs until one (1) week after the Court rules on this motion.

Respectfully submitted,
CLEMENT RIVERS, LLP

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August 12, 2024

I CONSENT:
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August 12, 2024