

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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Aug 14 2024

Appeal from Spartanburg County
Court of Common Pleas

SC Court of Appeals

R. Keith Kelly, Circuit Court Judge

Appellate Case No. 2022-001059
Circuit Court Cases No. 2019-CP-42-03708 and -03709

Kenneth Pace,
Individually and as Personal Representative of
the Estate of Earl E. Pace,

Respondent,

v.

Lake Emory Post Acute Care; THI of South Carolina at Camp Care,
LLC; THI of South Carolina, LLC; THI of Baltimore, Inc.; Fundamental
Administrative Services, LLC; Fundamental Clinical and Operational
Services, LLC; Fundamental Clinical Consulting, LLC; Fundamental
Long Term Care Holdings, LLC; and Kerry L. Wheeler, DO,

Defendants,

Of which Lake Emory Post Acute Care; THI of South Carolina at Camp
Care, LLC; THI of South Carolina, LLC; THI of Baltimore, Inc.;
Fundamental Administrative Services, LLC; Fundamental Clinical and
Operational Services, LLC; and Fundamental Long Term Care
Holdings, LLC, are

Appellants.

PROOF OF SERVICE

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I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that Appellants' **SECOND MOTION FOR EXTENSION OF TIME TO PETITION FOR REHEARING** was served on Respondent on August 14, 2024, by emailing (see attached) a copy of the same to Respondent's counsel of record:

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Respectfully submitted,
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August 14, 2024

From: [Bell, Pollyana \(Polly\)](#)
To: ["Anthony Harbin"; "jennifer@harbinlaw.com"; "skellner@harbinlaw.com"](#)
Cc: ["Hines, Russell"; "Justman, Aimee"](#)
Subject: Pace v. Lake Emory; Appellate Case No. 2022-001059 (CR 190600)
Date: Wednesday, August 14, 2024 1:21:52 PM
Attachments: [2nd Motion for extension - petition for rehearing.pdf](#)
[image001.png](#)

Enclosed please find Appellants' Second Motion for Extension of Time to Petition for Rehearing for service upon you in the above-referenced matter.

Thank you,

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