

RECEIVED

Oct 14 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FAIRFIELD COUNTY
Court of Common Pleas

Patrick C. Fant, III, Circuit Court Judge

Appellate Case No.: 2024-000596

Thomas D. Kilpatrick
as Special Administrator for the Estate of Anthony Lemon,..... Respondent,

v.

Pruitthealth - Ridgeway, LLC f/k/a Unihealth Post-Acute Care –
Tanglewood, LLC, United Health Services of South Carolina,
Inc., Pruitthealth Consulting Services, Inc., Pruitthealth
Therapy Services, Inc. f/k/a United Rehab, Inc., Pruitthealth, Inc.,
Neil Pruitt, Jr., THI of South Carolina at Columbia, LLC d/b/a
Midlands Health and Rehabilitation Center, THI of South
Carolina, LLC, Fundamental Clinical and Operational Services,
LLC, Fundamental Clinical Consulting, LLC, Fundamental
Long Term Care Holdings, Inc., Fundamental Administrative
Services, LLC, and Hunt Valley Holdings, LLC,..... Defendants,

Of whom THI of South Carolina at Columbia, LLC d/b/a Midlands Health and
Rehabilitation Center, THI of South Carolina, LLC, Fundamental Clinical and
Operational Services, LLC, Fundamental Administrative Services, LLC, and
Hunt Valley Holdings, LLC, are..... Appellants.

**MOTION FOR EXTENTION OF TIME TO FILE AND SERVE INITIAL BRIEF
AND DESIGNATION OF MATTER OF RESPONDENT**

Respondent Thomas D. Kilpatrick as Special Administrator for the Estate of
Anthony Lemon by and through his undersigned counsel, pursuant to Rule 263(b) of

the South Carolina Appellate Court Rules, respectfully requests a thirty (30) day extension of time to file and serve his initial brief and designation of matter to be included on the record on appeal.

Presently the deadline for Respondent's initial brief and designation of matter is October 23, 2024. On account of work-related commitments, Respondent respectfully requests this deadline be extended by 30 days. Respectfully, Respondent believes this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellants.

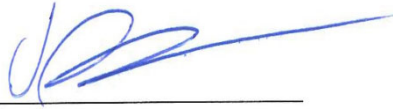
WHEREFORE, Respondent moves this Honorable Court to grant him a 30-day extension of time to file and serve his initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing and serving his initial brief and designation of matter would be November 22, 2024, according to the undersigned's calculations. Further, Respondent respectfully requests the Court hold the present initial briefing/designation of matter deadline in abeyance until it acts upon this motion. The undersigned certifies that he has consulted with counsel for Appellants and he consents to the filing of this motion.

[SIGNATURE PAGE TO FOLLOW]

Respectfully submitted,

PARKER LAW GROUP, LLP

October 14, 2024
Hampton, South Carolina

By:  _____

Neil E. Alger (SC Bar #100530)
John E. Parker, Jr. (SC Bar #104225)
101 Mulberry Street, East
P.O. Box 487
Hampton, SC 29924
Phone: (803) 903-1781
nalger@parkerlawgroupsc.com
jayparker@parkerlawgroupsc.com

ATTORNEYS FOR RESPONDENT

RECEIVED

Oct 14 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FAIRFIELD COUNTY
Court of Common Pleas

Patrick C. Fant, III, Circuit Court Judge

Appellate Case No.: 2024-000596

Thomas D. Kilpatrick
as Special Administrator for the Estate of Anthony Lemon,..... Respondent,

v.

Pruitthealth - Ridgeway, LLC f/k/a Unihealth Post-Acute Care –
Tanglewood, LLC, United Health Services of South Carolina,
Inc., Pruitthealth Consulting Services, Inc., Pruitthealth
Therapy Services, Inc. f/k/a United Rehab, Inc., Pruitthealth, Inc.,
Neil Pruitt, Jr., THI of South Carolina at Columbia, LLC d/b/a
Midlands Health and Rehabilitation Center, THI of South
Carolina, LLC, Fundamental Clinical and Operational Services,
LLC, Fundamental Clinical Consulting, LLC, Fundamental
Long Term Care Holdings, Inc., Fundamental Administrative
Services, LLC, and Hunt Valley Holdings, LLC,..... Defendants,

Of whom THI of South Carolina at Columbia, LLC d/b/a Midlands Health and
Rehabilitation Center, THI of South Carolina, LLC, Fundamental Clinical and
Operational Services, LLC, Fundamental Administrative Services, LLC, and
Hunt Valley Holdings, LLC, are..... Appellants.

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing Motion for Extension of
Time to File and Serve Initial Brief and Designation of Matter of Respondent has
been served upon the following counsel of record by emailing a copy of the same, this
14th of October 2024.

CLEMENT RIVERS, LLP

D. Jay Davis, Jr. (SC Bar No. 12084)
jdavis@ycrlaw.com
Stephen L. Brown (SC Bar No. 66468)
sbrown@ycrlaw.com
Matthew O. Riddle (SC Bar No. 76650)
mriddle@ycrlaw.com
Gaillard T. Dotterer, III (SC Bar No.
103620)
gdotterer@ycrlaw.com
Russell G. Hines (SC Bar No. 72100)
rhines@ycrlaw.com
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Appellants

October 14, 2024
Hampton, South Carolina

SMYTH WHITLEY, LLC

Joshua S. Whitley (SC Bar No. 77826)
jwhitley@smythwhitley.com
Allie A. Maples (SC Bar No. 105526)
amaples@smythwhitley.com
126 Seven Farms Drive, Suite 260
Charleston, South Carolina 29492
(843) 606-5635

**Attorneys for Defendants
Pruitthealth Ridgeway, LLC**

Respectfully submitted,

PARKER LAW GROUP, LLP

By: 

Neil E. Alger (SC Bar #100530)
John E. Parker, Jr. (SC Bar #104225)
101 Mulberry Street, East
P.O. Box 487
Hampton, SC 29924
Phone: (803) 903-1781
nalger@parkerlawgroupsc.com
jayparker@parkerlawgroupsc.com

ATTORNEYS FOR RESPONDENT