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Jan 02 2025

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE 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.

**SECOND MOTION FOR EXTENSION
OF TIME TO PETITION FOR REHEARING**

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
James D. Gandy III (SC Bar No. 11925)
Russell G. Hines (SC Bar No. 72100)
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P.O. Box 993 (29402)
(843) 720-5488

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, pursuant to Rule 263(b), SCACR, and move for a second extension of fifteen (15) days' additional time to file/serve a petition for rehearing of this matter, which the Court decided via opinion filed November 27, 2024. *See Hutley v. THI of South Carolina at Magnolia Manor Inman, LLC*, Unpublished Op. No. 2024-UP-399.

Presently, by order of this Court filed December 17, 2024, the current deadline to petition for rehearing is January 3, 2025. Because of work-related and other time commitments, the undersigned counsel for Appellants request the Court's allowance of fifteen (15) days' additional time to petition for rehearing. Respectfully, the undersigned submits there is good cause for the Court to grant the relief requested herein, as it is, under the circumstances, a reasonable dispensation, timely sought, consistent with the interests of justice, posing no threat of undue prejudice to any other party.

WHEREFORE, Appellants request the Court grant them a second extension of 15 days' time to petition for rehearing. By the undersigned's calculations, the grant of this relief would make the new deadline to petition for rehearing January 21, 2025. ADDITIONALLY, for the same reasons set forth in support of the within request for an extension of time, Appellants request the Court hold the

present deadline for petitioning for rehearing in abeyance until the Court acts on this motion.

[Signature page for Second Motion for Extension of Time to Petition for Rehearing, Appellate Case No. 2023-001612]

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Stephen L. Brown (SC Bar No. 66468)
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January 2, 2025

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Defendants.

Of which THI of South Carolina at Magnolia Manor Inman, LLC,
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PROOF OF SERVICE

CLEMENT RIVERS, LLP
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Attorneys for Appellants

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 January 2, 2025, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

C. Daniel Pruitt, Esquire
danlaw@bellsouth.net
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300 Pettigru Street
Greenville, SC 29601
Attorney for Respondent

Respectfully submitted,
CLEMENT RIVERS, LLP

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Attorneys for Appellants

Charleston, South Carolina

January 2, 2025

From: [Bell, Pollyana \(Polly\)](#)
To: ["Dan Pruitt"; "Dan Pruitt-paralegal"; "Dan Pruitt"](#)
Cc: [Hines, Russell; Justman, Aimee](#)
Subject: Hutley v. THI ; Appellate Case No. 2023-001612 (CR 210889)
Date: Thursday, January 2, 2025 12:15:14 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,

Pollyana Bell
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