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Jan 15 2025

SC Court of Appeals

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

Appeal from Spartanburg County
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

Circuit Court Case No. 2022-CP-42-02595
Court of Appeals Case No. 2023-001371

Unpublished Opinion No. 2024-UP-320, (S.C. Ct. App. filed September 25, 2024)

Steven McCarson,
as Personal Representative of the Estate of Louie Arches,

Respondent,

v.

THI of South Carolina at Magnolia Manor–Inman, LLC
d/b/a Magnolia Manor–Inman, THI of South Carolina at Inman, LLC,
THI of South Carolina, LLC, Hunt Valley Holdings, LLC,
Fundamental Administrative Services, LLC,
Fundamental Clinical And Operational Services, LLC,
THI of Baltimore, LLC, and James H. Mack,

Petitioners.

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

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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Attorneys for Petitioners

COMES NOW Petitioners, THI of South Carolina at Magnolia Manor–Inman, LLC d/b/a Magnolia Manor–Inman, THI of South Carolina at Inman, LLC, THI of South Carolina, LLC, Hunt Valley Holdings, LLC, Fundamental Administrative Services, LLC, Fundamental Clinical And Operational Services, LLC, THI of Baltimore, LLC, and James H. Mack, 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 an 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.

Pursuant to Rule 242(c), SCACR, the present deadline for the petition for writ of certiorari is today, Wednesday, January 15, 2025. Due to other time commitments, both work- and non-work-related, the undersigned counsel for Petitioners requests ten (10) additional days 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 January 27, 2025, 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
Stephen L. Brown (SC Bar No. 66468)
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Charleston, South Carolina

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Petitioners.

PROOF OF SERVICE

CLEMENT RIVERS, LLP

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Attorneys for Petitioners

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioners, hereby certify that Petitioners' **MOTION FOR EXTENSION OF TIME TO FILE/SERVE REPLY TO RETURN TO PETITION FOR REHEARING** was served on Respondent on January 15, 2025, by emailing (see attached email) a copy of the same to his counsel of record:

PARKER LAW GROUP, LLP
Lee D. Cope, Esquire
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John E. Parker, Jr., Esquire
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-and-

KOON COOK & WALTERS, LLC
Jamie L. Walters, Esquire
jwalters@kcw-law.com
Attorneys for Respondent

I also certify that Petitioner's **MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI** and **PROOF OF SERVICE** was filed with the South Carolina Court of Appeals on January 15, 2025, via email (see attached) to ctappfilings@sccourts.org.

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines (SC Bar No. 72100)
Attorneys for Petitioners

Charleston, South Carolina

January 15, 2025

From: [Bell, Pollyana \(Polly\)](#)
To: lcope@parkerlawgroupsc.com; jayparker@parkerlawgroupsc.com; iwalters@kcw-law.com; ccartier@parkerlawgroupsc.com
Cc: [Hines, Russell](#); [Justman, Aimee](#)
Subject: McCarson v. THI; Ct. App. Case No. 2023-001371 (CR 220432)
Date: Wednesday, January 15, 2025 1:32:43 PM
Attachments: [Motion for extension - Petition for Writ of Certiorari.pdf](#)
[image001.png](#)

Enclosed please find Petitioners' Motion for Extension of Time to File/Serve their Petition for Writ of Certiorari for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell
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