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Jan 27 2025

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Appeal from Spartanburg County  
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

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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Unpublished Opinion No. 2024-UP-320, (S.C. Ct.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)

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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.

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

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CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
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James D. Gandy, III (SC Bar No. 11925)  
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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 a second 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.

Presently, by order of this Court filed January 16, 2025, the deadline for Petitioners’ Petition for a Writ of Certiorari is today, Monday, January 27, 2025. Due to other time commitments, both work- and non-work-related, as well as the recent unexpected weather event, 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 February 6, 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  
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January 27, 2025