

**RECEIVED**

**Jan 27 2025**

**SC Court of Appeals**

**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Unpublished Opinion No. 2024-UP-320, (S.C. Ct.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)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
James D. Gandy, III (SC Bar No. 11925)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
P.O. Box 993 (29402)  
Charleston, South Carolina 29401  
(843) 720-5488

*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  
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)  
25 Calhoun Street, Suite 400  
P.O. Box 993 (29402)  
Charleston, South Carolina 29401  
(843) 720-5488  
*Attorneys for Petitioners*

Charleston, South Carolina

January 27, 2025

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Fundamental Administrative Services, LLC,  
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Petitioners.

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**PROOF OF SERVICE**

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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)

25 Calhoun Street, Suite 400

P.O. Box 993 (29402)

Charleston, South Carolina 29401

(843) 720-5488

*Attorneys for Petitioners*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioners, hereby certify that Petitioners' **SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE REPLY TO RETURN TO PETITION FOR REHEARING** was served on Respondent on January 27, 2025, by emailing (see attached email) a copy of the same to his counsel of record:

PARKER LAW GROUP, LLP  
Lee D. Cope, Esquire  
[lcope@parkerlawgroupsc.com](mailto:lcope@parkerlawgroupsc.com)  
John E. Parker, Jr., Esquire  
[jayparker@parkerlawgroupsc.com](mailto:jayparker@parkerlawgroupsc.com)

*-and-*

KOON COOK & WALTERS, LLC  
Jamie L. Walters, Esquire  
[jwalters@kew-law.com](mailto:jwalters@kew-law.com)  
*Attorneys for Respondent*

I also certify that Petitioner's **SECOND 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 27, 2025, via email (see attached) to [ctappfilings@sccourts.org](mailto: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 27, 2025

**From:** [Bell, Pollyana \(Polly\)](#)  
**To:** [lcope@parkerlawgroupsc.com](mailto:lcope@parkerlawgroupsc.com); [jayparker@parkerlawgroupsc.com](mailto:jayparker@parkerlawgroupsc.com); [iwalters@kcw-law.com](mailto:iwalters@kcw-law.com); [ccartier@parkerlawgroupsc.com](mailto:ccartier@parkerlawgroupsc.com)  
**Cc:** [Hines, Russell](#); [Justman, Aimee](#)  
**Subject:** McCarson v. THI; Sup. Ct. Case No. 2025-000090; Ct. App. Case No. 2023-001371 (CR 220432)  
**Date:** Monday, January 27, 2025 1:08:26 PM  
**Attachments:** [2nd Motion for extension - Petition for Writ of Certiorari.pdf](#)  
[image001.png](#)

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Enclosed please find Petitioners' Second 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  
Project Assistant  
Commercial Litigation Practice Group  
Phone:(843)720-5488 | Fax:(843)579-1369



**CLEMENT RIVERS, LLP**  
25 Calhoun Street • Suite 400 • Charleston, SC 29401  
[ycrlaw.com](http://ycrlaw.com)