

**RECEIVED**

**Mar 05 2025**

**SC Court of Appeals**

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

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Appeal from Fairfield County  
Court of Common Pleas  
Patrick C. Fant, III, Circuit Court Judge

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Case No. 2023-CP-20-00268  
Appeal Case No. 2024-000596

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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.

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**MOTION FOR EXTENSION OF TIME  
TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANTS**

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*Attorneys for Appellants*

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COME NOW Appellants, 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, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an extension of ten (10) days' additional time to file/serve their initial reply brief.

Presently, in accordance with Rule 208(a)(3), the deadline for Appellants' initial reply brief is March 6, 2025. On account of work-related and other time commitments, Appellants respectfully request this deadline be extended by 10 days. Respectfully, Appellants believe this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellants move this Honorable Court to grant them an additional extension of 10 days' time to file/serve their initial reply brief. With the extension requested herein, the new deadline for filing/serving their initial reply brief would be March 17, 2025, according to the undersigned's calculations. Further, Appellants respectfully request the Court hold the present deadline in abeyance until it acts upon this motion.

*[signature on next page]*

Respectfully submitted,  
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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**

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*Attorneys for Appellants*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that Appellants' **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANTS** was served on Respondent (and the other Defendants besides Appellants) on March 5, 2025, by emailing (see email) a copy of the same to counsel of record:

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Pruitthealth Therapy Services, Inc. f/k/a  
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Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
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March 5, 2025

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**Cc:** [Justman, Aimee](#); [Hines, Russell](#)  
**Subject:** Kilpatrick v. Pruitthealth - Ridgeway, LLC ; Appellate Case No. 2024-000596 (CR 230463)  
**Date:** Wednesday, March 5, 2025 11:41:13 AM  
**Attachments:** [Motion for Extension - Initial Reply Brief.pdf](#)  
[image001.png](#)

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Enclosed please find Appellants' Motion for Extension of Time to File/Serve their Initial Reply Brief for service upon you in the above-referenced matter.

Thank you,

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Project Assistant  
Commercial Litigation Practice Group  
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