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**Mar 12 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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Case No. 2022-CP-42-01163  
Appellate Case No. 2025-000398  
Unpublished Opinion No. 2024-UP-399 (S.C. Ct. App. filed Nov. 27, 2024)

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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

Petitioners.

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

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*Attorneys for Petitioners*

NOW COME Petitioners, 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, on the grounds stated below, 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.

Presently, by order of this Court dated March 5, 2025, the deadline for the petition for writ of certiorari is March 13, 2025. Due to other time commitments, both work- and non-work-related, the undersigned counsel for Petitioners request 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 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 March 24, 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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