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S.C. SUPREME COURT

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

Appeal from Spartanburg County
Court of Common Pleas
Grace Gilchrist Knie, Circuit Court Judge

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Unpublished Opinion No. 2024-UP-399, (S.C. Ct.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)

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.

PROOF OF SERVICE

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

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioners, hereby certify that Petitioners' **SECOND MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI** was served on Respondent on March 12, 2025, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

C. Daniel Pruitt, Esquire
danlaw@bellsouth.net
dan@danpruittlaw.com
300 Pettigru Street
Greenville, SC 29601
Attorney for Respondent

I also certify that Petitioners' **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 March 12, 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

March 12, 2025

From: [Bell, Pollyana \(Polly\)](#)
To: [Dan Pruitt](#); [Dan Pruitt](#)
Cc: [Justman, Aimee](#); [Hines, Russell](#)
Subject: Hutley v. THI; Sup. Ct. Case No. 2025-000398; Ct. App. Case No. 2023-001612 (CR 210889)
Date: Wednesday, March 12, 2025 10:35:31 AM
Attachments: [2nd Motion for Extension - Petition for Writ.pdf](#)
[image001.png](#)

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
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