

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

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Apr 23 2025

SC Court of Appeals

Appeal from Spartanburg County
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

Sup. Ct. Case No. 2025-000398

Case No. 2022-CP-42-01163

Appellate Case No. 2023-001612

Unpublished Opinion No. 2024-UP-399 (S.C. Ct.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

Appellants.

**RESPONDENT'S MOTION FOR EXTENSION OF TIME
TO RESPOND TO PETITION FOR WRIT OF CERTIORARI**

The Dan Pruitt Law Firm
C. Daniel Pruitt (SC Bar No. 66497)
300 Pettigru Street
Greenville, SC 29601
864-232-4273

Attorney[s] for Respondent

NOW COME[S] Respondent, by and through his undersigned counsel, pursuant to Rule 263(b), SCACR, and hereby move[s] for an extension of ten (10) days additional time to file/serve his response to the Petition for a Writ of Certiorari and corresponding designation of matter to be included in the record on appeal.

The current deadline for the response to the petition for writ of certiorari is April 23, 2025. Because of work-related and other time commitments, Respondent respectfully requests that this deadline be extended by 10 days, through May 3, 2025. Respectfully, Respondent believes that this relief is consistent with the interests of justice and will not result in any undue prejudice to any party.

WHEREFORE, Respondent moves this Honorable Court to grant him an extension of 10 days' time to file/serve his response to the petition for writ of certiorari and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline would be **May 3, 2025**. According to the undersigned's calculations. Further, Respondent respectfully requests that the Court hold this present deadline in abeyance until it acts upon this motion.

(signature page to follow)

Respectfully submitted,

By: s/ C. Daniel Pruitt
Bar # 66497
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(864) 232-4273
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Greenville, South Carolina
April 23, 2025

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PROOF OF SERVICE

The Dan Pruitt Law Firm
C. Daniel Pruitt (SC Bar No. 66497)
300 Pettigru Street
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864-232-4273

Attorney for Respondent

I, **C. Daniel Pruitt**, of the Dan Pruitt Law Firm, attorney for the Respondent, hereby certify that Respondent's MOTION FOR EXTENSION OF TIME TO RESPOND TO PETITION FOR WRIT OF CERTIORARI was served on Appellants' on April 23, 2025, by emailing (see attached email) a copy of the same to Appellants' counsel of record:

Russell G. Hines, Esquire (rhines@yctrlaw.com)
D. Jay Davis, Jr., Esquire (jdavis@yctrlaw.com)
James D. Gandy, III, Esquire (tgandy@yctrlaw.com)
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Attorneys for Appellants

Respectfully submitted,

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Greenville, South Carolina
April 23, 2025

Lindsay Harrison

From: Lindsay Harrison
Sent: Wednesday, April 23, 2025 11:48 AM
To: rhines@ycrlaw.com; Davis, Jay; Gandy, III, James D. (Tripp); Dotterer III, Gaillard T. (Gilly); sbrown@ycrlaw.com
Cc: Dan Pruitt; Wakeham, Rebecca (Becky)
Subject: RE: Hutley v. THI; Sup. Ct. Case No. 2025-000398
Attachments: Motion for Ext-Resp to Pet for Writ of Cert (4-23-25).pdf

Good morning,

Please find attached **Respondent's Motion for Extension of Time to Respond to the Petition for Writ of Certiorari** in the above-captioned matter. The Motion will be filed today.

Should you have any questions or concerns, please do not hesitate to contact my office.

Kindest regards,



LINDSAY C. HARRISON
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