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Apr 21 2025

SC Court of Appeals

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

Appeal from Charleston County
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

Case No. 2021-CP-10-02744

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SC Court of Appeals

William Haynes,
as Personal Representative of the Estate of Elizabeth Varner,

Respondent,

v.

Fundamental Administrative Services, LLC,
Fundamental Clinical and Operational Services, LLC, and
Jerrolyn Montgomery-Small,

Appellants.

**MOTION FOR EXTENSION OF TIME TO
FILE/SERVE RETURN TO MOTION TO DISMISS APPEAL**

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
Matthew O. Riddle (SC Bar No. 76650)
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 Appellants

COME NOW Appellants, Fundamental Administrative Services, LLC, Fundamental Clinical and Operational Services, LLC, and Jerrolyn Montgomery-Small, 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 return to the motion to dismiss appeal.

Pursuant to Rule 240(e), SCACR, the present deadline for Appellants' return to the motion to dismiss appeal is today, April 21, 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 extension of 10 days' time to file/serve their return to the motion to dismiss appeal. With the extension requested herein, the new deadline to file/serve their return to the motion to dismiss appeal would be May 1, 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.

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Respondent,

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PROOF OF SERVICE

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Attorneys for Appellants

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
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April 21, 2025



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SC Court of Appeals

April 22, 2025

VIA US MAIL

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: William Haynes, as Personal Representative of the Estate of Elizabeth Varner vs.
Fundamental Administrative Services LLC, and Fundamental Clinical and
Operational Services, LLC, and Jerrolyn Montgomery-Small
Appellate Case No.: 2025-000286
Case No.: 2021-CP-10-02744
YCR File: 14347-20200697

Dear Ms. Kitchings:

Enclosed please find our firm's check representing the filing fee for Appellants' Motion for Extension of Time to File/Serve their Return to Motion to Dismiss Appeal, which was electronically filed on April 21, 2025, in the above-referenced matter.

With best wishes and kindest regards, I am

Sincerely,

CLEMENT RIVERS, LLP

Pollyana Bell
Secretary

/pbb
Enclosure(s)



CLEMENT RIVERS, LLP

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Charleston, SC 29402

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Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
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