

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

---

Appeal from Spartanburg County  
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

---

**RECEIVED**

**May 05 2025**

S.C. SUPREME COURT

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Unpublished Opinion No. 2024-UP-399 (S.C. Ct.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 SECOND 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 additional 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 May 3, 2025. Because of work-related and other time commitments, Respondent respectfully requests that this deadline be extended by 10 days, through May 15, 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 15, 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  
Attorney for Respondent  
300 Pettigru Street  
Greenville, SC 29601  
(864) 232-4273  
[dan@danpruittlaw.com](mailto:dan@danpruittlaw.com)

Greenville, South Carolina  
May 5, 2025