

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

RECEIVED

May 05 2025

S.C. SUPREME COURT

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Unpublished Opinion No. 2024-UP-399 (S.C. Ct.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

PROOF OF SERVICE

The Dan Pruitt Law Firm
C. Daniel Pruitt (SC Bar No. 66497)
300 Pettigru Street
Greenville, SC 29601
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 SECOND MOTION FOR EXTENSION OF TIME TO RESPOND TO PETITION FOR WRIT OF CERTIORARI was served on Appellants' on May 5, 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)
Gaillard T. Dotterer, III, Esquire (gdotterer@yctrlaw.com)
Stephen L. Brown, Esquire (sbrown@yctrlaw.com)

CLEMENT RIVERS, LLP
25 Calhoun Street, Suite 400
Charleston, SC 29401

Attorneys for Appellants

Respectfully submitted,

By: s/ C. Daniel Pruitt
Bar # 66497
Attorney for Respondent
300 Pettigru Street
Greenville, SC 29601
(864) 232-4273
dan@danpruittlaw.com

Greenville, South Carolina
May 5, 2025

Lindsay Harrison

From: Lindsay Harrison
Sent: Monday, May 5, 2025 11:36 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); Justman, Aimee; Bell, Pollyana (Polly)
Subject: RE: Hutley v. THI; Sup. Ct. Case No. 2025-000398
Attachments: Second Motion for Extension Form- writ of certiorari (sc supreme court of appeals) 5-5-25.pdf

Good morning,

Please find attached **Respondent's Second 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
PARALEGAL TO C. DANIEL PRUITT

Phone: 864-232-4273
Facsimile: 864-232-7781
Email: lindsay@danpruittlaw.com

300 Pettigru Street
Greenville, South Carolina 29601

www.danpruittlawfirm.com

CONFIDENTIALITY NOTICE: This e-mail has been sent by a law firm, and the contents may contain confidential, privileged, or otherwise legally protected information. If you are not the intended recipient, you must not read, retain, or disseminate this message. Instead, you must delete this message immediately. It is the intent of the sender and the recipient(s) to preserve the attorney-client privilege, and any unintentional publication of this e-mail is not a waiver of such.