

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

**RECEIVED**

**May 15 2025**

**SC Court of Appeals**

Appeal from Dorchester County  
Court of Common Pleas  
Maite Murphy, Circuit Court Judge

Case No. 2023-CP-18-00758  
Appellate Case No. 2025-000275

James Graham,  
as Personal Representative of the Estate of Phyllis Chestnut,

Respondent,

v.

Hallmark Long Term Care, LLC d/b/a Hallmark Healthcare Center,  
Fundamental Long Term Care, Inc., THI of South Carolina, LLC, THI of Baltimore, Inc.,  
Hunt Valley Holdings, LLC, Fundamental Administrative Services, LLC,  
Fundamental Clinical and Operational Services, LLC, Fundamental Clinical Consulting, LLC,  
and Curana Health of South Carolina, P.C. f/k/a Elite Patient Care of South Carolina, PC,

Defendants,

Of which Hallmark Long Term Care, LLC d/b/a Hallmark Healthcare Center,  
THI of South Carolina, LLC, THI of Baltimore, Inc., Hunt Valley Holdings, LLC,  
Fundamental Administrative Services, LLC, Fundamental Clinical and Operational Services,  
LLC, and Fundamental Clinical Consulting, LLC, are the

Appellants.

**MOTION FOR EXTENSION OF TIME TO  
FILE/SERVE INITIAL BRIEF OF APPELLANT**

CLEMENT RIVERS, LLP  
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*Attorneys for Appellants*

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COME NOW Appellants, Hallmark Long Term Care, LLC d/b/a Hallmark Healthcare Center, THI of South Carolina, LLC, THI of Baltimore, Inc., Hunt Valley Holdings, LLC, Fundamental Administrative Services, LLC, Fundamental Clinical and Operational Services, LLC, and Fundamental Clinical Consulting, LLC, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an extension of thirty (30) days' additional time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, in accordance with Rule 208(a)(1), the deadline for Appellants' initial brief and designation of matter is May 16, 2025. On account of work-related and other time commitments, Appellants respectfully request this deadline be extended by 30 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 additional extension of 30 days' time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving their initial brief and designation of matter would be June 16, 2025, according to the undersigned's calculations. Further, Appellants respectfully request the Court hold the present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

*[signature on next page]*

*[signature page for Motion for Extension of Time to File/Serve Initial Brief of Appellant,  
Appellate Case No. 2025-000275]*

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
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