

**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. 2024-CP-10-03732

Appellate No. 2025-000237

Joe Bryan,

v.

THI of South Carolina at Charleston, LLC
d/b/a Riverside Health and Rehab,

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Jul 17 2025

SC Court of Appeals

105376

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JUL 28 2025

SC Court of Appeals

Respondent,

Appellant.

**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)
James D. Gandy III (SC Bar No. 11925)
T. Ashton Phillips III (SC Bar No. 104227)
Russell G. Hines (SC Bar No. 72100)
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P.O. Box 993 (29402)
Charleston, South Carolina 29401
(843) 720-5488

Attorneys for Appellant

COMES NOW Appellant, THI of South Carolina at Charleston, LLC d/b/a Riverside Health and Rehab, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of ten (10) days' additional time to file/serve its return to Respondent's motion to dismiss appeal.

Presently, in accordance with Rule 240(e), the deadline for Appellant's return to Respondent's motion to dismiss appeal is today, July 17, 2025. On account of work-related and other time commitments, Appellant respectfully requests this deadline be extended by 10 days. Respectfully, Appellant believes this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellant moves this Honorable Court to grant it an additional extension of 10 days' time to file/serve its return to Respondent's motion to dismiss appeal. With the extension requested herein, the new deadline for filing/serving its initial brief and designation of matter would be July 28, 2025, according to the undersigned's calculations. Further, Appellant respectfully requests the Court hold the present deadline in abeyance until it acts upon this motion.

[Signature on next page]

[Signature page for Motion for Extension of Time to File/Serve Return to Motion to Dismiss Appeal, Appellate No. 2025-000237]

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
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Charleston, South Carolina

July 17, 2025

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Case No. 2024-CP-10-03732

Joe Bryan,

Respondent,

v.

THI of South Carolina at Charleston, LLC
d/b/a Riverside Health and Rehab,

Appellant.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
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Attorneys for Appellant

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, hereby certify that Appellant's **MOTION FOR EXTENSION OF TIME TO FILE/SERVE RETURN TO MOTION TO DISMISS APPEAL** was served on Respondent on July 17, 2025, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

Samuel R. Clawson Jr., Esquire

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Bert G. Utsey III, Esquire

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CLAWSON FARGNOLI UTSEY, LLC

Attorney for Respondent

Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/Russell G. Hines

Russell G. Hines (SC Bar No. 72100)

Attorneys for Appellant

Charleston, South Carolina

July 17, 2025



CLEMENT RIVERS, LLP

ATTORNEYS AT LAW

Pollyana Bell
Secretary

Direct Dial: (843) 720-5488
Direct Fax: (843) 579-1369
E-mail: pbell@yrcrlaw.com

July 18, 2025

VIA US MAIL

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

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SC Court of Appeals

Re: Joe Bryan v. THI of South Carolina at Charleston, LLC d/b/a Riverside Health & Rehabilitation
Appellate Case No.: 2025-000237
Case No.: 2024-CP-10-03732
YCR File: 14347-20230776

Dear Ms. Kitchings:

Enclosed please find our firm's check representing the filing fee for Appellant's Motion for Extension of Time to File/Serve their Return to Motion to Dismiss Appeal, which was electronically filed on July 17, 2025, in the above-referenced matter.

With best wishes and kindest regards, I am

Sincerely,

CLEMENT RIVERS, LLP

Pollyana Bell
Secretary

/pbb
Enclosure(s)

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Thursday, July 17, 2025 12:02 PM
To: Christy Fagnoli; laura@cfulaw.com; Sam Clawson; Bert Utsey
Cc: Hines, Russell; Justman, Aimee
Subject: Bryan v. THI; Appellate Case No. 2025-000237 (CR 230776)
Attachments: Motion for Extension - Motion to Dismiss.pdf

Enclosed please find Appellant's Motion for Extension of Time to File/Serve their Return to Motion to Dismiss Appeal for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell

Legal Secretary to Stephen L. Brown,
Russell G. Hines, Stephen A. Griffith, Jr.
Commercial Litigation Practice Group
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South Carolina Court of Appeals
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SC Court of Appeals

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