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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Maite Murphy, Circuit Court Judge

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 AN EXTENSION OF TIME TO FILE/SERVE
INITIAL BRIEF OF RESPONDENT**

Respondent James Graham, as Personal Representative of the Estate of
Phyllis Chestnut, by and through his undersigned counsel, pursuant to Rule 263(b),
SCACR, moves for an extension of thirty (30) days' additional time to file/serve his

initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, in accordance with Rule 208(a)(2), the deadline for Respondent's initial brief and designation of matter is August 15, 2025. On account of work-related and other time commitments, Respondent respectfully request this deadline be extended by 30 days. Respectfully, Respondent believe this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellants.

WHEREFORE, Respondent move this Honorable Court to grant him an additional extension of 30 days' time to file/serve his 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 his initial brief and designation of matter would be September 15, 2025, according to the undersigned's calculations. Further, Respondent respectfully requests the Court hold the present initial briefing/designation of matter deadline in abeyance until it acts upon this motion.

[SIGNATURE PAGE TO FOLLOW]

Respectfully submitted,

PARKER LAW GROUP, LLP

By: _____



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ATTORNEYS FOR RESPONDENT

August _____, 2025
Hampton, South Carolina