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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

Case No. 2023-CP-18-00758

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.

PROOF OF SERVICE

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Attorneys for Appellants

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that Appellants' **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANT** was served on Respondent, on September 19, 2025, by emailing (see attached email) a copy of the same to their counsel of record:

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Respectfully submitted,
CLEMENT RIVERS, LLP

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Charleston, South Carolina

September 19, 2025

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Friday, September 19, 2025 10:02 AM
To: sgoldberg@steinberglawfirm.com; Becky Chapin; Lee Cope; Jay Parker; Caitlin Ball; Shanna Jarrell; Weatherly, Lee C.; Thompson, Kristen K.; Richards, Cierra
Cc: Hines, Russell; Justman, Aimee
Subject: Graham v. Hallmark; Appellate Case No. 2025-000275 (CR 230448)
Attachments: 1st Motion for Extension - Initial Reply Brief.pdf

Enclosed please find Appellants' Motion for Extension of Time to File/Serve their Initial Reply Brief for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell

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