

**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
Appellate Case No. 2025-000275

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Oct 01 2025
SC Court of Appeals

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.

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

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)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

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 ten (10) days' additional time to file/serve their initial reply brief.

Presently, by order of this Court dated September 23, 2025, the deadline for Appellants' initial reply brief is October 2, 2025. On account of work-related and other time commitments, Appellants respectfully request this deadline be extended by 10 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 10 days' time to file/serve their initial reply brief. With the extension requested herein, the new deadline for filing/serving their initial reply brief would be October 13, 2025, according to the undersigned's calculations. Further, Appellants respectfully request the Court hold the present deadline in abeyance until it acts upon this motion.

[signature on next page]

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

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)
James D. Gandy III (SC Bar No. 11925)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488
Attorneys for Appellants

Charleston, South Carolina

October 1, 2025

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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

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)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Appellants

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that Appellants' **SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANT** was served on Respondent, on October 1, 2025, by emailing (see attached email) a copy of the same to their counsel of record:

Lee D. Cope, Esquire
lcope@parkerlawgroupsc.com
John E. Parker, Jr., Esquire
jayparker@parkerlawgroupsc.com
PARKER LAW GROUP, LLP

-and-

Steven E. Goldberg (SC Bar No. 66446)
sgoldberg@steinberglawfirm.com

Attorneys for Respondent

Lee C. Weatherly, Esquire
lweatherly@csvl.law
Kristen K. Thompson, Esquire
kthompson@csvl.law
COPELAND, STAIR, VALZ & LOVELL, LLP

*Attorneys for Defendant
Curana Health of South Carolina, PC
f/k/a Elite Patient Care of South Carolina, PC*

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines (SC Bar No. 72100)
Attorneys for Appellants

Charleston, South Carolina

October 1, 2025

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Wednesday, October 1, 2025 11:07 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: 2nd Motion for Extension - Initial Reply Brief.pdf

Enclosed please find Appellants' Second 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

Legal Secretary to Stephen L. Brown,
Russell G. Hines, Stephen A. Griffith, Jr.
Commercial Litigation Practice Group
Phone:(843)720-5488 | Fax:(843)579-1369



CLEMENT RIVERS, LLP
25 Calhoun Street • Suite 400 • Charleston, SC 29401
ycrlaw.com

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