

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

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Appeal from Charleston County  
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

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Case No. 2021-CP-10-02744

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William Haynes,  
as Personal Representative of the Estate of Elizabeth Varner,

Respondent,

v.

Fundamental Administrative Services, LLC,  
Fundamental Clinical and Operational Services, LLC, and  
Jerrolyn Montgomery-Small,

Appellants.

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

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CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
Matthew O. Riddle (SC Bar No. 76650)  
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*Attorneys for Appellants*

**RECEIVED**  
**Nov 17 2025**  
**SC Court of Appeals**

COME NOW Appellants, Fundamental Administrative Services, LLC, Fundamental Clinical and Operational Services, LLC, and Jerrolyn Montgomery-Small, 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, in accordance with Rule 208(a)(3), the deadline for Appellants' initial reply brief is November 17, 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 extension of 10 days' time to file/serve their initial reply brief. With the extension requested herein, the new deadline to file/serve their initial reply brief would be December 1, 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]*

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
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*Attorneys for Appellants*

Charleston, South Carolina

November 17, 2025

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Appellants.

PROOF OF SERVICE

CLEMENT RIVERS, LLP  
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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 APPELLANTS** was served on Respondent on November 17, 2025, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

Shawn T. Pinkston, Esquire  
PINKSTON LAW FIRM, LLC  
[shawnpinkston@me.com](mailto:shawnpinkston@me.com)

*Attorney for Respondent*

Respectfully submitted,  
CLEMENT RIVERS, LLP

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

*Attorneys for Appellants*

Charleston, South Carolina

November 17, 2025

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Monday, November 17, 2025 2:06 PM  
**To:** Shawn Pinkston  
**Cc:** Hines, Russell; Justman, Aimee  
**Subject:** Haynes v. Fundamental Administrative; Appellate Case No. 2025-000286 (CR 200697)  
**Attachments:** 1st Motion for extension - Initial Reply Brief of Appellant.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

Legal Secretary to Stephen L. Brown,  
Russell G. Hines, Stephen A. Griffith, Jr.  
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