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**Mar 06 2026**

**SC Court of Appeals**

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

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Appeal from Fairfield County  
Court of Common Pleas

Patrick C. Fant, III, Circuit Court Judge

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Case No. 2023-CP-20-00268  
Appeal Case No. 2024-000596

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Thomas D. Kilpatrick  
as Special Administrator for the Estate of Anthony Lemon,

Respondent,

v.

Pruitthealth - Ridgeway, LLC f/k/a Unihealth Post-Acute Care -  
Tanglewood, LLC, United Health Services of South Carolina,  
Inc., Pruitthealth Consulting Services, Inc., Pruitthealth  
Therapy Services, Inc. f/k/a United Rehab, Inc., Pruitthealth,  
Inc., Neil Pruitt, Jr., THI of South Carolina at Columbia, LLC  
d/b/a Midlands Health and Rehabilitation Center, THI of South  
Carolina, LLC, Fundamental Clinical and Operational Services,  
LLC, Fundamental Clinical Consulting, LLC, Fundamental  
Long Term Care Holdings, Inc., Fundamental Administrative  
Services, LLC, and Hunt Valley Holdings, LLC,

Defendants,

Of whom THI of South Carolina at Columbia, LLC d/b/a  
Midlands Health and Rehabilitation Center, THI of South  
Carolina, LLC, Fundamental Clinical and Operational Services,  
LLC, Fundamental Administrative Services, LLC, and Hunt  
Valley Holdings, LLC, are

Appellants.

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**MOTION FOR EXTENSION OF TIME  
TO PETITION FOR REHEARING**

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*\*Counsel identified on the next page*

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*Attorneys for Appellants*

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COMES NOW Appellants, THI of South Carolina at Columbia, LLC d/b/a Midlands Health and Rehabilitation Center, THI of South Carolina, LLC, Fundamental Clinical and Operational Services, LLC, Fundamental Administrative Services, LLC, and Hunt Valley Holdings, LLC, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an extension of fifteen (15) days' additional time to file/serve a petition for rehearing of this matter.

Presently, by order of this Court dated February 23, 2026, the deadline to petition for rehearing is March 6, 2026. Because of work-related and other time commitments, the undersigned counsel for Appellants request the Court's allowance of fifteen (15) days' additional time to petition for rehearing.

Respectfully, the undersigned submits there is good cause for the Court to grant the relief requested herein, as it is, under the circumstances, a reasonable dispensation, timely sought, consistent with the interests of justice, posing no threat of undue prejudice to any other party.

WHEREFORE, Appellants request the Court grant them an extension of 15 days' time to petition for rehearing. By the undersigned's calculations, the grant of this relief would make the new deadline to petition for rehearing March 23, 2026. ADDITIONALLY, for the same reasons set forth in support of the within request

for an extension of time, Appellants request the Court hold the present deadline for petitioning for rehearing in abeyance until the Court acts on this motion.

Respectfully submitted,  
CLEMENT RIVERS, LLP

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March 6, 2026

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Therapy Services, Inc. f/k/a United Rehab, Inc., Pruitthealth,  
Inc., Neil Pruitt, Jr., THI of South Carolina at Columbia, LLC  
d/b/a Midlands Health and Rehabilitation Center, THI of South  
Carolina, LLC, Fundamental Clinical and Operational Services,  
LLC, Fundamental Clinical Consulting, LLC, Fundamental  
Long Term Care Holdings, Inc., Fundamental Administrative  
Services, LLC, and Hunt Valley Holdings, LLC,

Defendants,

Of whom THI of South Carolina at Columbia, LLC d/b/a  
Midlands Health and Rehabilitation Center, THI of South  
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LLC, Fundamental Administrative Services, LLC, and Hunt  
Valley Holdings, LLC, are

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' **SECOND MOTION FOR EXTENSION OF TIME TO PETITION FOR REHEARING** was served on Respondent (and the other Defendants besides Appellants) on March 6, 2026, by emailing (see email) a copy of the same to counsel of record:

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Pruitthealth Consulting Services, Inc.,  
Pruitthealth Therapy Services, Inc. f/k/a  
United Rehab, Inc., Pruitthealth, Inc.,  
Neil Pruitt, Jr.*

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Russell G. Hines (SC Bar No. 72100)  
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Charleston, South Carolina

March 6, 2026

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Justman, Aimee

SC Court of Appeals

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**Cc:** Hines, Russell; Beach, Sarah  
**Subject:** Appeal 2024-000596 - Kilpatrick v. Pruitthealth - Ridgeway - CR 230463 - Motion -  
service email  
**Attachments:** Kilpatrick Motion.pdf

Please find the attached Motion for service on you in the above-referenced matter.

Thank you,

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