

RECEIVED

Apr 10 2026

SC Court of Appeals

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

Appeal from Greenville County
Court of Common Pleas

Perry H. Gravely, Circuit Court Judge

Case No. 2018-CP-23-01934
Appellate Case No. 2025-002304

James Boyd Jr.,

Appellant,

v.

THI of South Carolina at Magnolia Place at Greenville, LLC;
Fundamental Clinical and Operational Services, LLC; and
Fundamental Administrative Services, LLC,

Respondents.

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

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 Respondents

COME NOW Respondents THI of South Carolina at Magnolia Place at Greenville, LLC, Fundamental Clinical and Operational Services, LLC, and Fundamental Administrative Services, LLC, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an extension of thirty (30) days' additional time to file/serve their 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 Respondents' initial brief and designation of matter is April 13, 2026. On account of work-related and other time commitments, Respondents respectfully request this deadline be extended by 30 days. Respectfully, Respondents believe this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellant.

WHEREFORE, Respondents move this Honorable Court to grant them an additional extension of 30 days' time to file/serve their 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 their initial brief and designation of matter would be May 13, 2026, according to the undersigned's calculations. Further, Respondents respectfully request the Court hold their present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

[signature on next page]

[signature for Motion for Extension of Time to file/serve Initial Brief of Respondents, Appellate Case No. 2025-002304]

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 Respondents

Charleston, South Carolina

April 10, 2026

RECEIVED

Apr 10 2026

SC Court of Appeals

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

Appeal from Greenville County
Court of Common Pleas

Perry H. Gravely, Circuit Court Judge

Case No. 2018-CP-23-01934
Appellate Case No. 2025-002304

James Boyd Jr.,

Appellant,

v.

THI of South Carolina at Magnolia Place at Greenville, LLC;
Fundamental Clinical and Operational Services, LLC; and
Fundamental Administrative Services, LLC,

Respondents.

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 Respondents

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Respondents, hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF RESPONDENTS** was served on the other party(ies) to this matter on April 10, 2026, via email (see attached) to their counsel of record:

Joshua P. Cantwell
josh@cantwelllawfirm.org
Cantwell Law Firm, LLC
Attorneys for Appellant

Respectfully submitted,
CLEMENT RIVERS, LLP

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

Charleston, South Carolina

April 10, 2026

Beach, Sarah

RECEIVED

Apr 10 2026

SC Court of Appeals

From: Beach, Sarah
Sent: Friday, April 10, 2026 3:23 PM
To: 'josh@cantwelllawfirm.org'
Cc: Hines, Russell; Justman, Aimee
Subject: Boyd, Jr. vs. THI of SC - Appeal No. 2025-002304 - 2018-CP-23-01934 - CR170615
Attachments: Boyd Motion for Extension.pdf

Good afternoon,

Attached for service in the above-referenced matter, please find a Motion for Extension of Time to File/Serve Initial Brief of Respondents.

Best,
Sarah Beach
Commercial Litigation
Secretary
sbeach@ycrlaw.com

Phone: 843-720-5488 Fax: 843-579-1369



CLEMENT RIVERS, LLP

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

MatterId:20170615