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May 13 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.

**SECOND 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)
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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 a second 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, by order of this Court filed April 13, 2026, the deadline for Respondents' initial brief and designation of matter is May 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 a second 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 June 12, 2026, according to the undersigned's calculations. Further, Respondents respectfully request the Court hold their present deadline in abeyance until it acts upon this motion.

[signature on next page]

[signature for Second 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)
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Charleston, South Carolina

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PROOF OF SERVICE

CLEMENT RIVERS, LLP
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I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Respondents, hereby certify that the foregoing **SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF RESPONDENTS** was served on the other party(ies) to this matter on May 13, 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

May 13, 2026

Beach, Sarah

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From: Beach, Sarah
Sent: Wednesday, May 13, 2026 2:12 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_2nd Motion for Extension - Initial Brief.pdf

SC Court of Appeals

Good afternoon,

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

Thank you.

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

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