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Jun 10 2026

SC Court of Appeals

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

Appeal from Fairfield County
Court of Common Pleas

Patrick C. Fant, III, Circuit Court Judge

Case No. 2023-CP-20-00268

Court of Appeals No. 2024-000596

Unpublished Opinion No. 2026-CP-043 (S.C. Ct. App. filed Feb. 4, 2026)

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

Petitioners.

**MOTION FOR EXTENSION OF TIME
TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI**

**Counsel identified on the next page*

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Attorneys for Petitioners

NOW COME Petitioners, 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, on the grounds stated below, pursuant to Rule 263(b), SCACR, as well as the Court's order of July 16, 2014, regarding Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals, and hereby move for an extension of ten (10) days' time to file/serve their petition to this Court for issuance of a writ of certiorari to the Court of Appeals to review its decision in this matter.

Pursuant to Rule 242(c), SCACR, the present deadline for the petition for writ of certiorari is Monday, June 15, 2026. Due to other time commitments, both work- and non-work-related, the undersigned counsel for Petitioners requests ten (10) additional days to prepare its petition seeking this Court's review of the Court of Appeals' decision via writ of certiorari, and the undersigned submits there is good cause to allow the requested dispensation: It is in furtherance of the interests of justice; it will not work any undue prejudice upon any other party; and it is consistent with the extension protocol established by the Court's aforementioned order of July 16, 2014.

WHEREFORE, Petitioners respectfully request this Honorable Court grant them an extension of ten (10) days' time to file/serve their petition for writ of certiorari. With the extension requested herein, the new deadline for filing/serving the petition for writ of certiorari would be June 25, 2026, according to the undersigned's calculations. Further, Petitioners respectfully request the Court hold this present deadline in abeyance until it acts upon this motion.

[signature on next page]

[Signature page for Motion for Extension of time to serve/file Petition for Writ of Certiorari, re Unpublished Opinion No. 2026-CP-043 (S.C. Ct. App. filed Feb. 4, 2026)]

Respectfully submitted,

CLEMENT RIVERS, LLP

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Attorneys for Petitioners

Charleston, South Carolina

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Carolina at Columbia, LLC d/b/a Midlands Health and Rehabilitation
Center, THI of South Carolina, LLC, Fundamental Clinical and
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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
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Petitioners.

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Attorneys for Petitioners

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioners, hereby certify that the **MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI** was served on Respondent (and the other Defendants besides Petitioners) on June 10, 2026, by emailing (see email) a copy of the same to counsel of record:

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- Tanglewood, LLC, United Health Services of
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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
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Attorneys for Petitioners

Charleston, South Carolina

June 10, 2026

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SC Court of Appeals

From: Justman, Aimee
Sent: Wednesday, June 10, 2026 2:12 PM
To: 'nalger@parkerlawgroupsc.com'; 'jayparker@parkerlawgroupsc.com';
'jwhitley@smythwhitley.com'; 'amaples@smythwhitley.com'
Cc: Hines, Russell
Subject: Appeal 2024-000596 - Kilpatrick v. Pruitthealth - Ridgeway, LLC - CR230463 - Motion
for Extension Petition for Writ - Service email
Attachments: Kilpatrick - MFE Petition for Writ.pdf

Attached for service on you in the above-referenced matter, please find a Motion for Extension of time to serve/file Petition for Writ of Certiorari.

Thank you,

Aimee Justman
Paralegal and Group Coordinator
Commercial Litigation & Appellate Group
Clement Rivers, LLP
Phone: (843) 720-5460
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