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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.

**CONSENT MOTION FOR THIRD 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 a third extension of one week's 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 May 14, 2026, the deadline for Respondents' initial brief and designation of matter is June 12, 2026. On account of work-related and other time commitments, including a long-standing vacation for which the undersigned is currently out of the office, Respondents respectfully request this deadline be extended by one week. Respectfully, Respondents believe this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellant. The undersigned counsel has conferred with Appellant's counsel, who has indicated his consent to the relief requested.

WHEREFORE, Respondents move this Honorable Court to grant them a third extension of one week's 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 19, 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 Consent Motion for Third 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)
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Attorneys for Respondents

Charleston, South Carolina

June 12, 2026

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PROOF OF SERVICE

CLEMENT RIVERS, LLP
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James D. Gandy, III (SC Bar No. 11925)
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I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Respondents, hereby certify that the foregoing **CONSENT MOTION FOR THIRD EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF RESPONDENTS** was served on the other party(ies) to this matter on June 12, 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

June 12, 2026

Justman, Aimee

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From: Justman, Aimee
Sent: Friday, June 12, 2026 11:38 AM
To: Josh Cantwell
Cc: Hines, Russell
Subject: Appeal 2025-002304 - Boyd v. THI of SC - CR170615 - Motion for Extension - Service Email
Attachments: 3rd Motion for Extension.pdf

SC Court of Appeals

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

Thank you,

Aimee Justman
Paralegal and Group Coordinator
Commercial Litigation & Appellate Group
Clement Rivers, LLP
Phone: (843) 720-5460
Fax: (843) 579-1385
MatterId:



CLEMENT RIVERS, LLP
25 Calhoun Street • Suite 400 • Charleston, SC 29401
yclaw.com