

RECEIVED

Jun 24 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Unpublished Opinion No. 2026-CP-043 (S.C. Ct.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.

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

**Counsel identified on the next page*

CLEMENT RIVERS, LLP
D. Jay Davis, Jr. (SC Bar No. 12084)
jdavis@ycrlaw.com
Stephen L. Brown (SC Bar No. 66468)
sbrown@ycrlaw.com
Matthew O. Riddle (SC Bar No. 76650)
mriddle@ycrlaw.com
Russell G. Hines (SC Bar No. 72100)
rhines@ycrlaw.com
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

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.

Presently, by order of this court dated June 11, 2026, the deadline for the petition for writ of certiorari is Thursday, June 25, 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 July 6, 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,
Appeal No. 2026-001309]*

Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/Russell G. Hines
D. Jay Davis, Jr. (SC Bar No. 12084)
jdavis@ycrlaw.com
Stephen L. Brown (SC Bar No. 66468)
sbrown@ycrlaw.com
Matthew O. Riddle (SC Bar No. 76650)
mriddle@ycrlaw.com
Russell G. Hines (SC Bar No. 72100)
rhines@ycrlaw.com
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Petitioners

Charleston, South Carolina

June 24, 2026

RECEIVED

Jun 24 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.

PROOF OF SERVICE

**Counsel identified on the next page*

CLEMENT RIVERS, LLP
D. Jay Davis, Jr. (SC Bar No. 12084)
jdavis@ycrlaw.com
Stephen L. Brown (SC Bar No. 66468)
sbrown@ycrlaw.com
Matthew O. Riddle (SC Bar No. 76650)
mriddle@ycrlaw.com
Russell G. Hines (SC Bar No. 72100)
rhines@ycrlaw.com
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Petitioners

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioners, hereby certify that the **SECOND 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 24, 2026, by emailing (see email) a copy of the same to counsel of record:

PARKER LAW GROUP, LLP
Neil E. Alger (SC Bar No. 100530)
nalger@parkerlawgroupsc.com
John E. Parker, Jr. (SC Bar No. 104225)
jayparker@parkerlawgroupsc.com

Attorneys for Respondent

SMYTH WHITLEY, LLC
Joshua S. Whitley (SC Bar No. 77826)
jwhitley@smythwhitley.com
Allie A. Maples (SC Bar No. 105526)
amaples@smythwhitley.com

*Attorneys for Defendants 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.*

Respectfully submitted,

CLEMENT RIVERS, LLP

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

Charleston, South Carolina

June 24, 2026

Jun 24 2026

Justman, Aimee

SC Court of Appeals

From: Justman, Aimee
Sent: Wednesday, June 24, 2026 10:39 AM
To: 'nalger@parkerlawgroupsc.com'; 'jayparker@parkerlawgroupsc.com';
'ccartier@parkerlawgroupsc.com'; 'jwhitley@smythwhitley.com';
'amaples@smythwhitley.com'
Cc: Hines, Russell; Davis, Jay; Riddle, Matthew
Subject: Appeal 2026-001309 – Kilpatrick v. Pruitthealth – Ridgeway – CR230463 – Motion for
Extension re Petition for Writ of Cert - service email
Attachments: Kilpatrick Motion.pdf

Attached for service on you in the above-referenced matter, please find the Second 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
Fax: (843) 579-1385
MatterId:



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