

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

RECEIVED

Jul 02 2026

SC Court of Appeals

Appeal from Charleston County
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

Case No. 2024-CP-10-03732

Appellate No. 2025-000237

Joe Bryan,

Respondent,

v.

THI of South Carolina at Charleston, LLC
d/b/a Riverside Health and Rehab,

Appellant.

**SECOND MOTION FOR EXTENSION OF TIME
TO PETITION FOR REHEARING**

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)
T. Ashton Phillips III (SC Bar No. 104227)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
P.O. Box 993 (29402)
Charleston, South Carolina 29401
(843) 720-5488

Attorneys for Appellant

COMES NOW Appellant, THI of South Carolina at Charleston, LLC d/b/a Riverside Health and Rehab, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of fifteen (15) days' additional time to file/serve a petition for rehearing of this matter, which the Court decided via opinion filed June 3, 2026. *See Bryan v. THI of South Carolina at Charleston, LLC*, Unpublished Op. No. 2026-UP-261.

Presently, by order of this Court filed June 18, 2026, the deadline to petition for rehearing is July 7, 2026. Because of work-related and other time commitments, the undersigned counsel for Appellant requests the Court's allowance of fifteen (15) days' additional time to petition for rehearing.

Respectfully, the undersigned submits there is good cause for the Court to grant the relief requested herein, as it is, under the circumstances, a reasonable dispensation, timely sought, consistent with the interests of justice, posing no threat of undue prejudice to any other party.

WHEREFORE, Appellant requests the Court grant it an extension of 15 days' time to petition for rehearing. By the undersigned's calculations, the grant of this relief would make the new deadline to petition for rehearing July 22, 2026. ADDITIONALLY, for the same reasons set forth in support of the within request for an extension of time, Appellant requests the Court hold the present deadline for petitioning for rehearing in abeyance until the Court acts on this motion.

[Signature on next page]

[Signature page for Second Motion for Extension of Time to Petition for Rehearing, Appellate Case No. 2025-000237]

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)

T. Ashton Phillips III (SC Bar No. 104227)

Russell G. Hines (SC Bar No. 72100)

25 Calhoun Street, Suite 400

P.O. Box 993 (29402)

Charleston, South Carolina 29401

(843) 720-5488

Attorneys for Appellant

Charleston, South Carolina

July 2, 2026

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

Appeal from Charleston County
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

Case No. 2024-CP-10-03732

Joe Bryan,

Respondent,

v.

THI of South Carolina at Charleston, LLC
d/b/a Riverside Health and Rehab,

Appellant.

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)
T. Ashton Phillips III (SC Bar No. 104227)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
P.O. Box 993 (29402)
Charleston, South Carolina 29401
(843) 720-5488

Attorneys for Appellant

RECEIVED

Jul 02 2026

SC Court of Appeals

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, hereby certify that Appellant's **SECOND MOTION FOR EXTENSION OF TIME TO PETITION FOR REHEARING** was served on Respondent on July 2, 2026, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

Samuel R. Clawson Jr., Esquire
sam@cfulaw.com
Christy R. Fagnoli, Esquire
christy@cfulaw.com
Bert G. Utsey III, Esquire
bert@cfulaw.com
Laura K. Wilkes-D'Amato, Esquire
laura@cfulaw.com
CLAWSON FARGNOLI UTSEY, LLC
Attorney for Respondent

Respectfully submitted,
CLEMENT RIVERS, LLP

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

Charleston, South Carolina

July 2, 2026

RECEIVED

Jul 02 2026

Beach, Sarah

SC Court of Appeals

From: Beach, Sarah
Sent: Thursday, July 2, 2026 2:05 PM
To: sam@cfulaw.com; christy@cfulaw.com; laura@cfulaw.com; Bert Utsey; Davis, Jay; Gandy, III, James D. (Tripp); Brown, Stephen L.; Hines, Russell; Phillips, Ashton
Cc: molly@cfulaw.com; sharon@cfulaw.com; Peterson, Susan; Justman, Aimee
Subject: (2025-000237) - Joe Bryan v. THI of South Carolina at Charleston, LLC d/b/a Riverside Health & Rehabilitation - Motion for Extension
Attachments: Bryan_Motion for Extension.pdf

Good afternoon,

Attached for service in the above-referenced matter please find **Appellant's Second Motion for Extension of Time to July 22, 2026, to Petition for Rehearing.**

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:20230776