

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

RECEIVED

Jul 20 2026

S.C. 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
Supreme Court No. 2026-001309

Unpublished Opinion No. 2026-CP-043 (S.C. Ct.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 RETURN
TO MOTION TO DISMISS 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 return to the motion to dismiss the petition for a writ of certiorari and for sanctions.

Presently, pursuant to Rule 240(e), SCACR, the deadline for the return to the motion to dismiss is today, Monday, July 20, 2026. Due to other time commitments, both work- and non-work-related, the undersigned counsel for Petitioners requests ten (10) additional days to prepare their return to the motion to dismiss, 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 return to the motion to dismiss the petition for a writ of certiorari and for sanctions. With the extension requested herein, the new deadline for filing/serving the return to motion to dismiss would be July 30, 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 Return to Motion to Dismiss
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

July 20, 2026