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S.C. SUPREME COURT

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
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Unpublished Opinion No. 2026-CP-043 (S.C. Ct.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 AUGUST 11, 2026, TO SERVE/FILE
RETURN TO MOTION TO DISMISS PETITION FOR WRIT OF CERTIORARI**

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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 one (1) additional days' time, i.e., to August 11, 2026, to file/serve their return to the motion to dismiss the petition for a writ of certiorari and for sanctions.

Presently, by order of this Court dated July 29, 2026, the deadline for the return to the motion to dismiss is August 10, 2026. The motion to dismiss is one of four that has been filed in response to petitions for a writ of certiorari in four cases. All of the motions to dismiss were filed/served on the same day, making all returns due at the same time. Additionally, in the time since these motions were filed/served, the undersigned's normal work schedule has been disrupted by time away from the office associated with family summer vacation plans, and the present deadline (August 10, 2026) happened to coincide with a date on which the undersigned had motion hearings in two cases. Accordingly, due to other time commitments, both work- and non-work-related, the undersigned counsel for Petitioners requests one (1) additional day 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 one (1) 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 August 11, 2026. Further, Petitioners respectfully request the Court hold this present deadline in abeyance until it acts upon this motion.

Respectfully submitted,
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August 10, 2026