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SC Court of Appeals

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

Appeal from York County
Court of Common Pleas

William A. McKinnon, Circuit Court Judge

Appellate Case No. 2026-001163
Circuit Court Case No. 2025-CP-46-04373

Jacqueline Gibbs as Power of Attorney for Bonnie J. Hunter,

Respondent,

v.

THI of South Carolina at Rock Hill, LLC d/b/a Magnolia Manor— Rock Hill;
and THI of South Carolina, LLC,

Appellants.

**SECOND MOTION FOR EXTENSION OF TIME TO
FILE/SERVE INITIAL BRIEF OF APPELLANTS**

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis Jr. (SC Bar No. 12084)
Matthew O. Riddle (SC Bar No. 76650)
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Charleston, South Carolina 29401
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(843) 720-5488

Attorneys for Appellants

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COME NOW Appellants, THI of South Carolina at Rock Hill, LLC d/b/a Magnolia Manor— Rock Hill; and THI of South Carolina, LLC, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for a second extension of thirty (30) days' 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 August 10, 2026, the deadline for Appellants' initial brief and designation of matter is September 2, 2026. On account of work-related and other time commitments, Appellants respectfully request this deadline be extended by 30 days. Respectfully, Appellants believe this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellants move this Honorable Court to grant them an additional extension of 30 days' 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 October 2, 2026, according to the undersigned's calculations. Further, Appellants respectfully request the Court hold the present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

[signature on next page]

[Signature page for Second Motion for Extension of Time to File/Serve Initial Brief of Appellants, Appellate No. 2026-001163]

Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/Russell G. Hines

Stephen L. Brown (SC Bar No. 66468)

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Attorneys for Appellants

Charleston, South Carolina

September 1, 2026

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PROOF OF SERVICE

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I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that the **SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANTS** was served on Respondent on September 1, 2026, by emailing (see attached email) a copy of the same to his counsel of record:

RIKARD & PROTOPAPAS, LLC
Jescelyn Tillman Spitz, Esquire
jspitz@rplegalgroup.com
Attorneys 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

September 1, 2026

Justman, Aimee

From: Justman, Aimee
Sent: Tuesday, September 1, 2026 11:51 AM
To: Jescelyn Spitz
Cc: Brown, Stephen L.; Davis, Jay; Riddle, Matthew; Hines, Russell
Subject: Appeal 2026-001163 – Gibbs v. THI – CR250991 – Motion for Extension
Attachments: Gibbs Motion.pdf

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

Thank you,

Aimee Justman
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