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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Chesterfield County
Court of Common Pleas

Eugene P. Warr, Jr., Circuit Court Judge

Case No. 2024-CP-13-00863
Appellate Case No. 2026-001859

Joshua Welch,
individually and as Personal Representative of
the Estate of Judith Welch,

Respondent,

v.

Rehab Center of Cheraw, LLC
d/b/a Rehabilitation Center of Cheraw;
THI of South Carolina, LLC; Hunt Valley Holdings, LLC
a/k/a Fundamental Long Term Care Holdings, LLC;
THI of Baltimore, Inc.; and Grace Villafranca,

Appellants.

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)
Russell G. Hines (SC Bar No. 72100)
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Attorneys for Appellants

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

COME NOW Appellants, Rehab Center of Cheraw, LLC d/b/a Rehabilitation Center of Cheraw; THI of South Carolina, LLC; Hunt Valley Holdings, LLC a/k/a Fundamental Long Term Care Holdings, LLC; THI of Baltimore, Inc.; and Grace Villafranca, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an 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, in accordance with Rule 208(a)(1), the deadline for Appellants' initial brief and designation of matter is October 9, 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 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 November 9, 2026, according to the undersigned's calculations. Further, Appellants respectfully request the Court hold the present deadline in abeyance until it acts upon this motion.

[*Signed on next page*]

[*Signature page for Motion for Extension of Time to File/Serve Initial Brief of Appellants, Appellate No. 2026-001859*]

Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/Russell G. Hines

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Attorneys for Appellants

Charleston, South Carolina

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Appellants.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
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Attorneys for Appellants

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that, on October 8, 2026, Appellants' **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANTS** was served on Respondent by emailing (see attached email) a copy of the same to counsel of record:

STROM LAW FIRM, LLC
John R. Alphin, Esquire
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-and-

WYCHE, PA
Jessica L. Fickling, Esquire
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Attorneys for Respondent

Respectfully submitted,

By: s/Russell G. Hines
CLEMENT RIVERS, LLP
Russell G. Hines (SC Bar No. 72100)

Attorneys for Appellants

Charleston, South Carolina

October 8, 2026

Justman, Aimee

From: Justman, Aimee
Sent: Thursday, October 8, 2026 7:45 AM
To: 'jfickling@wyche.com'; 'kezekiel@stromlaw.com'; 'jalphin@stromlaw.com'
Cc: Davis, Jay; Riddle, Matthew; Hines, Russell
Subject: Appeal No. 2026-001859 – Welch v. Rehab Center of Cheraw – CR240556 - Motion
Attachments: Welch Motion.pdf

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

Thank you,

Aimee Justman
Paralegal and Group Coordinator
Commercial Litigation & Appellate Group
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