

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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AUG 25 2014

Appeal from Spartanburg County
Court of Common Pleas

S.C. SUPREME COURT

J. Derham Cole, Circuit Court Judge

Appellate Case No. 2012-212871
Circuit Court Case No. 2007-CP-42-4601
(S.C. Ct. App. Order filed Aug 3, 2012)

Lawrence E. Morrow and Evelyn M. Morrow,

Petitioners,

v.

Fundamental Long-Term Care Holdings, LLC; Fundamental
Clinical Consulting, LLC; Fundamental Administrative
Services, LLC; THI of Baltimore, Inc.; THI of South Carolina,
LLC; THI of Baltimore Management, LLC; THI of South
Carolina at Magnolia Place at Spartanburg, LLC d/b/a
Magnolia Place at Spartanburg,

Respondents.

**CONSENT MOTION
FOR EXTENSION OF TIME
TO SERVE AND FILE BRIEF OF RESPONDENTS**

YOUNG CLEMENT RIVERS, LLP
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William L. Howard, Sr. (S.C. Bar No. 1967)
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-and-

SERPE, JONES, ANDREWS, CALLENDER
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Lori D. Proctor (S.C. Bar No. 80117)
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ATTORNEYS FOR RESPONDENTS

TO: THE HONORABLE JUSTICES OF THE SUPREME COURT OF
SOUTH CAROLINA

COME NOW Respondents, by and through their undersigned counsel, with the consent of counsel for Petitioners, pursuant to Rule 263(b), SCACR, and also this Court's Order filed 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 respectfully request an extension of Twenty (20) days' time to serve and file their brief in this matter.

Petitioners served and filed their brief on July 24, 2014. According to Rule 242(i), SCACR, Respondents' brief is presently due on August 25, 2014. On account of work-related and other time commitments of Respondents' counsel, including summer vacation plans, Respondents request a 20-day extension of time from August 25, 2014, i.e., through September 16, 2014, to serve and file their brief.

Respondents believe that the grant of the relief requested herein is consistent with the interests of justice and will not prejudice Petitioner. Moreover, as noted above, prior to submitting this motion, Respondents' counsel consulted with John S. Nichols, Esquire, counsel for Petitioners, and Mr. Nichols has kindly authorized the undersigned to represent that Petitioners consent to the Court's grant of the extension requested herein.

WHEREFORE, Respondents move this Honorable Court for an order extending their deadline for serving and filing their Brief of Respondents by 20 days' time from August 25, 2014, which, according to Respondents' calculations, would extend this deadline through September 16, 2014. In conjunction with this request, Respondents ask that the Court hold their present briefing deadline in abeyance until the Court has acted hereon.

<SIGNED ON THE FOLLOWING PAGE>

Respectfully submitted,

YOUNG CLEMENT RIVERS LLP

By: 

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ATTORNEYS FOR RESPONDENT

Charleston, South Carolina

Dated: 8/21/14

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PROOF OF SERVICE

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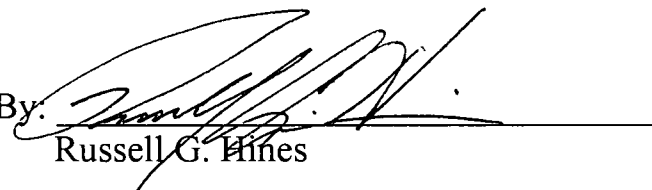
I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Respondents, do hereby certify that a copy of the **CONSENT MOTION FOR EXTENSION OF TIME TO SERVE AND FILE BRIEF OF RESPONDENTS** was sent to counsel for Petitioners via United States Mail, postage pre-paid on August 21, 2014 addressed as follows:

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-and-

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YOUNG CLEMENT RIVERS, LLP

By: 
Russell G. Hines

Charleston, South Carolina

Dated: 8/21/14