

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

J. Durham Cole, Circuit Court Judge

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

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**RECEIVED**

SEP 12 2014

S.C. Supreme Court

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 at Magnolia Place at Spartanburg,  
LLC d/b/a Magnolia Place at Spartanburg, ..... Respondents.

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**MOTION FOR EXTENSION**

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Pursuant to Rule 240, SCACR, and this Court's Administrative Order of July 16, 2014, Petitioners respectfully request a 4-day extension of the deadline for filing and serving their Reply Brief of Petitioner. This would make the deadline September 19, 2014.

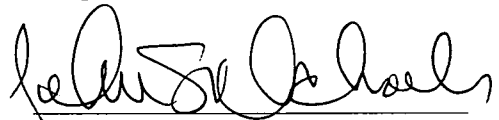
Petitioners have already been granted an extension of 30 days to prepare and file the Brief of Petitioners. *RE: Extensions*, Order (S.C. Sup. Ct. filed July 16, 2014). Thus, pursuant to the Administrative Order, Petitioners present the following good cause for

this Court's consideration of this request:

1. Petitioners' counsel is a member of the Board of Law Examiners, which is currently grading the July 2014 exam. Nearly 500 applicants sat for that exam.
2. Petitioners' counsel is law partners with Margaret Miles Bluestein, whose spouse passed away on Thursday, September 11, 2014. Petitioners' counsel will be a pall-bearer at the funeral, which takes place today, Friday, September 12, 2014. This activity requires Petitioners' counsel to miss unexpected time from work.
3. Petitioners' counsel is also counsel in three (3) other matters in which this Court has issued writs of certiorari to review those cases. Briefs are due during September 2014 in two matters, *Cunningham v. Anderson County* and *Lawing v. Univar*, while oral argument is already scheduled for September 23, 2014 in the expedited matter of *Brown v. Baby Girl Harper*.

September 12, 2014

Respectfully submitted,



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THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

J. Durham Cole, Circuit Court Judge

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S.C. Ct. App. Order dated March 5, 2012

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S.C. Supreme Court

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 at Magnolia Place at Spartanburg,  
LLC d/b/a Magnolia Place at Spartanburg, ..... Respondents.

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PROOF OF SERVICE

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The undersigned hereby certifies that on the date indicated below she served  
counsel for the Respondents with a copy of the *Motion for Extension* by mailing copies of  
the same by United States Mail with first class postage prepaid to the following  
addresses:

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Erin Bridges  
Paralegal  
BLUESTEIN, NICHOLS, THOMPSON  
& DELGADO, LLC

September 12, 2014  
Columbia, South Carolina