

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

Case No. 2007-CP-42-4601

Lawrence E. Morrow and Evelyn M. Morrow,

Appellants/Respondents,

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; and THI of South Carolina at
Magnolia Place at Spartanburg, LLC d/b/a Magnolia
Place at Spartanburg,

Respondents/Appellants.

**MOTION OF APPELLANTS
FOR EXTENSION OF TIME**

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/st/

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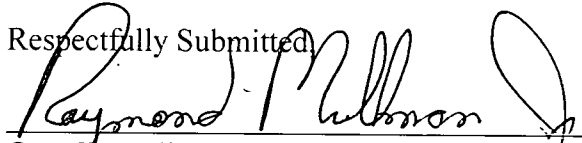
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The undersigned, as attorney for Appellants, hereby moves pursuant to Rule 240 of the South Carolina Appellate Court Rules, for an Order allowing an extension of time to file Appellants' Initial Brief and Designation of Matter. Upon information and belief, the deadline is January 3, 2012. No prior requests for extensions have been made.

Appellants respectfully request the extension for the following reasons: (a) a particularly heavy schedule with upcoming depositions and hearings, and preparation therefor, and existing requirements for memoranda and preparation of documents in other pending matters; and (b) the upcoming holiday season and related family commitments.

Appellants respectfully request an extension of time of thirty days, to February 2, 2012, for filing and service of the Initial Brief and Designation of Matter.

Respectfully Submitted



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December 19, 2011
Spartanburg, SC

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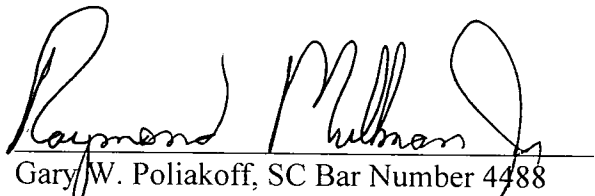
Respondents/Appellants.

PROOF OF SERVICE

I certify that I have served the **APPELLANTS' MOTION FOR EXTENSION OF TIME, AND A COPY OF APPELLANTS' LETTER TO SOUTH CAROLINA COURT OF APPEALS CLERK TANYA A. GEE DATED DECEMBER 19, 2011** on the above-captioned Defendants, by depositing a copy of it in the United States Mail, postage prepaid, on December 19, 2011, addressed to their attorneys of record: William L. Howard, Sr., Esq., and D. Jay Davis, Jr., Esq., and Russell G. Hines, Esq. of Young Clement Rivers, LLP, P.O. Box 993 Charleston, SC 29402 and Lori D. Proctor, Esq., Attorney for Respondents/Appellants at 919 Miliam Street, Suite 1700; Houston, Texas 77002

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December 19, 2011



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