

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

Defendants,

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

Respondents/Appellants.

---

**PROOF OF SERVICE RECEIVED**

---

APR 10 2012

**SC Court of Appeals**

---

Case No. 2007-CP-42-4601

---

YOUNG CLEMENT RIVERS, LLP  
D. Jay Davis, Jr. (S.C. Bar No. 6723)  
William L. Howard, Sr. (S.C. Bar No. 1967)  
Russell G. Hines (S.C. Bar No. 72100)  
P.O. Box 993  
Charleston, SC 29402  
Telephone: (843) 577-4000

*and*

SERPE, JONES, ANDREWS,  
CALLENDER & BELL, PLLC  
Lori D. Proctor (S.C. Bar No. 80117)  
333 Clay Street, Suite 3485  
Houston, Texas 77002  
Telephone: (713) 977-7070  
*Attorneys for the Respondents/Appellants*

I, Russell G. Hines, do hereby certify that a copy of the **Motion for Extension of Time to File/Serve Return to Petition for Rehearing** was sent to counsel for the Appellants/Respondents (i.e., counsel for all respondents/adverse parties to the Respondents/Appellants' appeal) via United States Mail, postage pre-paid on April 9, 2012 addressed as follows:

Gary W. Poliakoff, Esquire  
Poliakoff & Associates, P.A.  
P.O. Box 1571  
Spartanburg, SC 29304

*and*

Raymond P. Mullman, Esquire  
Poliakoff & Associates, P.A.  
P.O. Box 1571  
Spartanburg, SC 29304

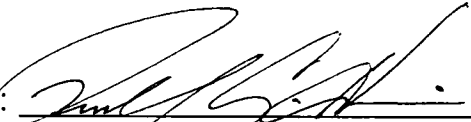
*and*

The Trammell Law Firm, PLLC  
M. Chad Trammell  
418 North State Line Avenue  
Texarkana, Arkansas 71854

<SIGNED ON THE FOLLOWING PAGE>

Respectfully submitted,

YOUNG CLEMENT RIVERS LLP

By:  \_\_\_\_\_

D. Jay Davis, Jr.

William L. Howard, Sr.

Russell G. Hines

P.O. Box 993

Charleston, SC 29402

Telephone: (843) 577-4000

*and*

SERPE, JONES, ANDREWS,

CALLENDER & BELL, PLLC

Lori D. Proctor (S.C. Bar No. 80117)

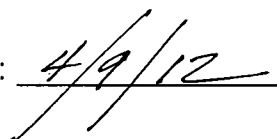
333 Clay Street, Suite 3485

Houston, Texas 77002

Telephone: (713) 977-7070

*Attorneys for the Respondents/Appellants*

Charleston, South Carolina

Dated:  \_\_\_\_\_

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

Defendants,

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

Respondents/Appellants.

---

**MOTION FOR EXTENSION OF TIME TO FILE/SERVE  
RETURN TO PETITION FOR REHEARING**

---

*Moot  
Ext. for  
Return*

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

COME NOW the Respondents/Appellants above captioned, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move this Honorable Court for a 10-day extension of time to file/serve their Return to the Appellants/Respondents' Petition for Rehearing.

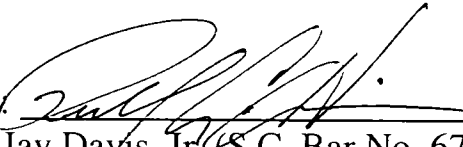
Such extension is requested in light of other work-related time commitments as well as the recent Easter holiday. The Respondents/Appellants submit that the requested extension is consistent with the interests of justice and that it will not work any undue prejudice upon the Appellants/Respondents.

WHEREFORE, the Respondents/Appellants submit that good cause exists for this Court to allow them until April 19, 2012 to file/serve their Return to the Appellants/Respondents' Petition for Rehearing. Further, the Respondents/Appellants ask that the Court hold the time limit for their return in abeyance until it has acted upon the instant motion.

**<SIGNED ON THE FOLLOWING PAGE>**

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By:   
D. Jay Davis, Jr. (S.C. Bar No. 6723)  
William L. Howard, Sr. (S.C. Bar No. 1967)  
Russell G. Hines (S.C. Bar No. 72100)  
P.O. Box 993  
Charleston, SC 29402  
Telephone: (843) 577-4000

*and*

SERPE, JONES, ANDREWS,  
CALLENDER & BELL, PLLC  
Lori D. Proctor (S.C. Bar No. 80117)  
333 Clay Street, Suite 3485  
Houston, Texas 77002  
Telephone: (713) 977-7070  
*Attorneys for the Respondents/Appellants*

Charleston, South Carolina

Dated: 4/9/12

---

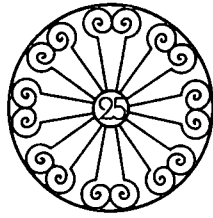
Case No. 2007-CP-42-4601

---

YOUNG CLEMENT RIVERS, LLP  
D. Jay Davis, Jr. (S.C. Bar No. 6723)  
William L. Howard, Sr. (S.C. Bar No. 1967)  
Russell G. Hines (S.C. Bar No. 72100)  
P.O. Box 993  
Charleston, SC 29402  
Telephone: (843) 577-4000

*and*

SERPE, JONES, ANDREWS,  
CALLENDER & BELL, PLLC  
Lori D. Proctor (S.C. Bar No. 80117)  
333 Clay Street, Suite 3485  
Houston, Texas 77002  
Telephone: (713) 977-7070  
*Attorneys for the Respondents/Appellants*



**YCR LAW**  
Young Clement Rivers, LLP

Elizabeth R. O'Neil  
Paralegal

Direct Dial: (843) 724-6658  
Direct Fax: (843) 579-2936  
E-mail: [coneil@ycrlaw.com](mailto:coneil@ycrlaw.com)

April 9, 2012

**VIA U.S. MAIL**

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: *Lawrence E. Morrow and Evelyn M. Morrow vs. Fundamental Long-Term Care Holdings, LLC, et al.*  
Case No.: 2007-CP-42-4601  
Claim No.: AIG Claim# 027-089-388/ HBLM# 0723767  
YCR File: 14347-20100252

Dear Ms. Kitchings:

Enclosed for filing in the above matter please find the original and seven (7) copies of a Motion for Extension, as well as our firm check in the amount of \$25.00 to cover the cost of filing same. Also enclosed are the original and two (2) copies of a Proof of Service concerning same.

Kindly return one (1) clocked copy of each document to us in the self-addressed, stamped envelope provided.

Thank you, in advance, for your assistance.

Respectfully yours,

YOUNG CLEMENT RIVERS, LLP

Elizabeth R. O'Neil  
Paralegal

ERO/ero

Enclosures

cc: Gary W. Poliakoff, Esquire  
Raymond P. Mullman, Jr., Esquire  
M. Chad Trammel, Esquire

**RECEIVED**

APR 10 2012

**SC COURT OF APPEALS**