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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

G. Thomas Cooper, Jr., Circuit Court Judge

Case No. 2017-CP-22-00040
Appellate Case No. 2017-001149

RECEIVED
JUN 28 2017
SC Court of Appeals

Henry G. Thomas and Ellie Pennington Thomas, as Personal
Representatives of the Estate of Johanna Thomas, Respondents,

v.

Morningside of South Carolina, L.P.; LifeTrust Properties,
LLC; Life Trust American, Inc.; FSQ/LTA Holdings, Inc.;
FSQ, Inc. Five Star Quality Care, Inc.; Anita Williams; John
Doe; and Richard Roe Corporation, of whom Morningside of
South Carolina, L.P.; LifeTrust Properties, LLC; Life Trust
American, Inc.; FSQ/LTA Holdings, Inc.; FSQ, Inc. Five
Star Quality Care, Inc.; and Anita Williams are the..... Appellants.

FIRST MOTION FOR EXTENSION OF TIME

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Appellants Morningside of South Carolina, L.P., LifeTrust Properties, LLC, Life Trust American, Inc., FSQ/LTA Holdings, Inc., FSQ, Inc. Five Star Quality Care, Inc., and Anita Williams respectfully request a thirty (30) day extension of time to file the Appellants' Initial Brief and Designation of Matter to be Included in the Record on Appeal in the above-captioned appeal. This is the first request for an extension of this deadline. This request is necessitated due to undersigned counsel's numerous other work conflicts, and scheduling deadlines.


Currently, Appellants' Initial Brief and Designation of Matter to be Included in the Record on Appeal are due on Friday, June 30, 2017. Based on the above, Appellants request an



Order granting a thirty (30) day extension of time until Monday, July 31, 2017, per Rule 263, SCACR, for Appellants' Initial Brief and Designation of Matter to be Included in the Record on Appeal.

Counsel for Respondent does not object to the requested extension of time. If the Court grants this Motion, then Appellants' Initial Brief and Designation of Matter to be Included in the Record on Appeal will be due on Monday, July 31, 2017. Appellants request that the current deadline be held in abeyance while the Court considers this request.

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By: 

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Counsel for Appellants

June 27, 2017

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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G. Thomas Cooper, Jr., Circuit Court Judge

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South Carolina, L.P.; LifeTrust Properties, LLC; Life Trust
American, Inc.; FSQ/LTA Holdings, Inc.; FSQ, Inc. Five
Star Quality Care, Inc.; and Anita Williams are the..... Appellants.


PROOF OF SERVICE

I certify that I have served the Appellants' First Motion for Extension of Time on Henry G. Thomas and Ellie Pennington Thomas, as Personal Representatives of the Estate of Johanna Thomas by depositing a copy of it in the United States Mail, postage prepaid, on June 27, 2017, addressed to their counsel of record, Laura S. Jordan and C. Caleb Connor, CONNOR & CONNOR, LLC, 224 Park Avenue SE, Aiken, South Carolina 29801.

[SIGNATURE ON FOLLOWING PAGE]

NELSON MULLINS RILEY & SCARBOROUGH LLP

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June 27, 2017

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JUN 28 2017

SC Court of Appeals

Via Federal Express

The Honorable Jenny A. Kitchings
Clerk of Court
Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

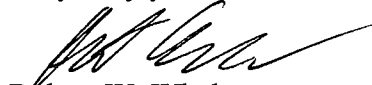
RE: Henry G. Thomas and Ellie Pennington Thomas as Personal Representatives of the Estate of Johanna Thomas, deceased v. Morningside of South Carolina, L.P.: Life Trust Properties, LLC; HCPI Trust; Life Trust American, Inc.; FSQ/LTA Holdings, Inc.; FSQ, Inc.; Five Star Quality Care, Inc.; Anita Williams; John Does; and Richard Roe Corporation
Case No. 2016-CP-22-00040
Appellate Case No. 2017-001149
Our File No. 41123/01531

Dear Ms. Kitchings:

Enclosed please find the original and one copy of Appellants' First Motion for Extension of Time in the above-referenced matter. Please file the original and return the clocked-in copy to me in the envelope provided. I would also very much appreciate your letting us know if this request can be granted.

By copy of this letter, I am hereby serving Plaintiff's counsel of record with a copy of the same. If you should have any questions or concerns, please do not hesitate to contact me.

Very truly yours,



Robert W. Whelan

RWW:kds

Enclosures

cc: Laura S. Jordan, Esquire
C. Caleb Connor, Esquire
Kenneth L. Connor, Esquire (*via regular mail*)

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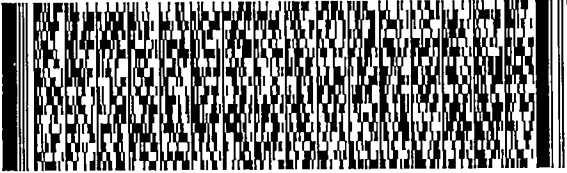
TO THE HONORABLE JENNY A. KITCHINGS
COURT OF APPEALS
1220 SENATE ST

COLUMBIA SC 29201

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INV:
PC:

REF: 41123.01531-KDAWSON-MOTION FOR
DEPT:

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