

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

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Appeal from York County
Court of Common Pleas

MAY 13 2019

William A. McKinnon, Circuit Court Judge

SC Court of Appeals

Case No. 2018-CP-46-01459

Teresa Murphy, as Personal Representative for the Estate of Isaac Strong,

Respondent,

v.

Hunt Valley Holdings, LLC f/k/a Fundamental Long Term Care Holdings, LLC;
Fundamental Clinical and Operational Services, LLC; Fundamental Consulting,
LLC; Fundamental Administrative Services, LLC; THI of Baltimore, Inc.; THI of
South Carolina, LLC; THI of South Carolina at Rock Hill, LLC d/b/a Magnolia
Manor of Rock Hill; and Amisub of S.C., Inc. d/b/a Piedmont Medical Center,

Defendants,

Of whom Fundamental Clinical and Operational Services, LLC; Fundamental
Administrative Services, LLC; THI of South Carolina, LLC; and THI of South
Carolina at Rock Hill, LLC d/b/a Magnolia Manor of Rock Hill are

Appellants.

**MOTION FOR EXTENSION OF TIME TO
FILE/SERVE INITIAL BRIEF OF APPELLANTS**

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
Perry M. Buckner, IV (SC Bar No. 100031)
J. Joseph Owens (SC Bar No. 102794)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Appellants

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

COME NOW Appellants, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an extension of thirty (30) days' additional time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed April 18, 2019, the deadline for Appellants' initial brief and designation of matter is May 13, 2019. On account of work-related and other time commitments, Appellants respectfully request that this deadline be extended by 30 days (from May 13, 2019), i.e., through June 12, 2019. Respectfully, Appellants believe that this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellants move this Honorable Court to grant them an additional extension of 30 days' time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving their initial brief and designation of matter would be June 12, 2019, according to the undersigned's calculations. Further, Appellants respectfully request that the Court hold their present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

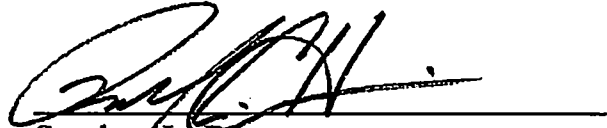
[Signature on next page]

*[Signature page for Motion for Extension of Time to
File/Serve Initial Brief of Appellants, Appeal No. 2019-000028]*

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By:



Stephen L. Brown (SC Bar No. 66468)

D. Jay Davis, Jr. (SC Bar No. 12084)

Perry M. Buckner, IV (SC Bar No. 100031)

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Attorneys for Appellants

Charleston, South Carolina

Dated: 5/13/19

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Teresa Murphy, as Personal Representative for the Estate of Isaac Strong,
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Carolina at Rock Hill, LLC d/b/a Magnolia Manor of Rock Hill are

Appellants.

PROOF OF SERVICE

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
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Attorneys for Appellants

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SC Court of Appeals

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellants, hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANTS** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on May 13, 2019, properly posted for delivery to the following addressees:

Chad A. McGowan, Esquire
Eve S. Goodstein, Esquire
McGowan, Hood & Felder, LLC
1539 Health Care Drive
Rock Hill, SC 29732

and

John Gressette Felder, Jr., Esquire
McGowan, Hood & Felder, LLC
1517 Hampton Street
Columbia, SC 29201

*Attorneys for Respondent
Teresa Murphy, as Personal Representative
for the Estate of Isaac Strong*

Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

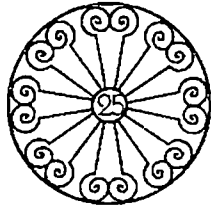
By: 

Russell G. Hines (SC Bar No. 72100)

Attorneys for Appellants

Charleston, South Carolina

Dated: 5/13/19



YCR LAW

Russell G. Hines
Partner

Direct Dial: (843) 720-5488
Direct Fax: (843) 579-1327
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May 13, 2019

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SC Court of Appeals

VIA FACSIMILE AND US MAIL

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

Re: Teresa Murphy, as Personal Representative for the Estate of Isaac Strong v. Hunt Valley Holdings, LLC f/k/a Fundamental Long Term Care Holdings, LLC; Fundamental Clinical and Operational Services, LLC; Fundamental Consulting, LLC; Fundamental Administrative Services, LLC; THI of Baltimore, Inc.; THI of South Carolina, LLC; THI of South Carolina at Rock Hill, LLC d/b/a Magnolia Manor of Rock Hill; and Amisub of SC, Inc. d/b/a Piedmont Medical Center
Appellate Case No. 2019-000028
Case No.: 2018-CP-46-01459
Claim No.: HBLM# 1727638
YCR File: 14347-20170985

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter, please find the original and seven (7) copies of a **Motion for Extension of Time to File/Serve Initial Brief of Appellants**. Also enclosed is the original and two (2) copies of a **Proof of Service** regarding the same as well as our firm's check in the amount of \$50.00 to cover the cost of filing this motion.

Kindly return one (1) stamped copy to us in the envelope provided. With best wishes and kindest regards, I am

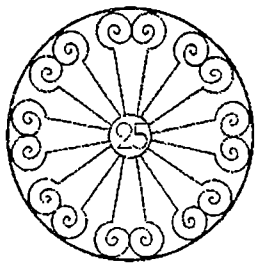
Sincerely,

YOUNG CLEMENT RIVERS, LLP

Russell G. Hines
Partner

RGH/amj
Enclosures

cc: Chad A. McGowan Esquire, McGowan, Hood & Felder, LLC
Eve S. Goodstein, Esquire, McGowan, Hood & Felder, LLC
John Gressette Felder, Jr., Esquire, McGowan, Hood & Felder, LLC
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Young Clement Rivers, LLP

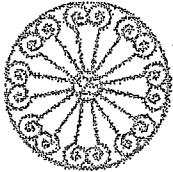
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THE FOLLOWING PAGES ARE FOR IMMEDIATE DELIVERY

To: 18037341839
From: tbates@ycrlaw.com
Date: May 13, 12:39:10 PM EDT
Subj: Murphy v. Hunt Valley Holdings, LLC, et al. - Appellate Case No.:2019-000028
Pages: 7

Please see attached from Russell Hines. Thank you.

Tiffany L. Bates
Legal Secretary
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