

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

**RECEIVED**

Appeal from York County  
Court of Common Pleas

JUN 12 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 FINAL EXTENSION OF TIME, UNTIL JUNE 19, 2019,  
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*

NOW COME Appellants above named, by and through their undersigned counsel, on the grounds stated below, and, pursuant to Rule 263(b), SCACR, hereby move this Honorable Court to allow them one final extension, until Wednesday, June 19, 2019, to file/serve their initial brief and designation of matter to be included in the record on appeal.

1. By order of May 16, 2019, the Court granted Appellants' second motion for an extension of their initial briefing/designation of matter deadline, establishing a deadline of Wednesday, June 12, 2019.

2. Appellants' counsel recognizes the notice in the Court's May 16<sup>th</sup> order that further extension of the initial briefing/designation deadline would have to be occasioned by extraordinary circumstances.

3. The present June 12<sup>th</sup> deadline falls during a week in which the primary author of Appellants' brief (Mr. Hines) is out of the office on a family vacation.

4. Mr. Hines had hoped to be able to complete the brief so that it would be filed/served prior to leaving the office, but on account of work-related and other time commitments he was unable to do so, and he humbly asks that the Court consider the circumstances (disruption to his normal work schedule) as sufficiently out of the ordinary to merit granting the dispensation requested herein, which he most respectfully submits is consistent with the interests of justice and will not unduly prejudice any other party.

WHEREFORE, Appellants respectfully request that this Honorable Court allow them through Wednesday, June 19, 2019, to file/serve their initial brief and designation of matter to be included in the record on appeal. Further, Appellants respectfully request that the Court hold their present initial briefing/designation of matter deadline in abeyance until it acts upon this motion.

Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

By: *Stephen L. Brown for R. Hines*

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)  
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(843) 720-5488

*Attorneys for Appellants*

Charleston, South Carolina

Dated: 6/12/19

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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)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
Perry M. Buckner, IV (SC Bar No. 100031)  
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25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Appellants*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellants, hereby certify that the foregoing **MOTION FOR FINAL EXTENSION OF TIME, UNTIL JUNE 19, 2019, 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 Jun 12, 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

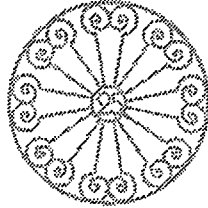
*Attorneys for Respondent  
Teresa Murphy, as Personal Representative  
for the Estate of Isaac Strong*

Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

By:   
Russell G. Hines (SC Bar No. 72100)  
*Attorneys for Appellants*

Charleston, South Carolina

Dated: 6/12/19



# YCR LAW

Kathleen B. Barnes  
Secretary

Direct Dial: (843) 720-5488  
Direct Fax: (843) 579-1369  
E-mail: kbarnes@ycrlaw.com

June 12, 2019

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SC Court of Appeals

**VIA US MAIL AND FACSIMILE**

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, et al  
Case No.: 2018-CP-46-01459  
Claim No.: HBLM# 1727638  
YCR File: 14347-20170985

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of a Motion for Final Extension of Time Until June 19, 2019 to File/Serve Initial Brief of Appellants, the original and one (1) copy of the Proof of Service for same and our firm's check in the amount of \$50.00 representing the filing fee. Please file the originals and return a court-stamped copy to me in the enclosed envelope.

With best wishes and kindest regards, I am,

Sincerely,

YCR LAW, LLP

Kathleen B. Barnes  
Secretary

Enclosures

(all via US Mail and email)

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