

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

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AUG 16 2019

SC Court of Appeals

Appeal from York County
Court of Common Pleas

William A. McKinnon, Circuit Court Judge

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 REPLY 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 ten (10) days' additional time to file/serve their initial reply brief and corresponding designation of matter to be included in the record on appeal.

Respondent filed her initial brief on August 6, 2019, making Appellants' initial reply brief and designation of matter due August 16, 2019, pursuant to Rule 208(a)(3), SCACR. On account of work-related and other time commitments, Appellants respectfully request that this deadline be extended by 10 days (from August 16, 2019), i.e., through August 26, 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 10 days' time to file/serve their initial reply 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 reply brief and designation of matter would be August 26, 2019, according to the undersigned's calculations. Further, Appellants respectfully request that the Court hold their present initial-reply-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

*[Signature page for Motion for Extension of Time to
File/Serve Initial reply 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)

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.

Charleston, South Carolina

Dated:

8/15/19

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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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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 REPLY BRIEF OF APPELLANTS** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on August 16, 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

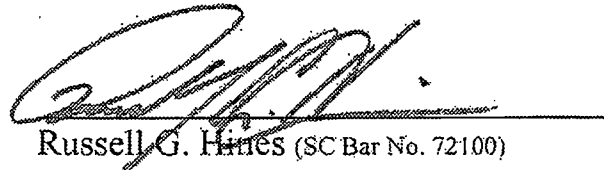
and

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:

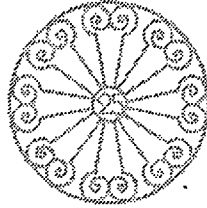


Russell G. Hines (SC Bar No. 72100)

Attorneys for Appellants:

Charleston, South Carolina

Dated: 8/15/19



YCR LAW

Kathleen B. Barnes
Secretary

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

August 16, 2019

VIA US MAIL AND FASCIMILE

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
Appellate Case No. 2019-000028
Case No.: 2018-CP-46-01459
Claim No.: HBLM# 1727638
YCR File: 14347-20170985

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Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of our motion for Extension of Time to File/Serve Initial Reply Brief of Appellants, the original and one (1) copy of the Proof of Service of 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 of each to me in the enclosed envelope.

By copy to all counsel of record I am serving them with the same.

With best wishes and kindest regards, I am

Sincerely,

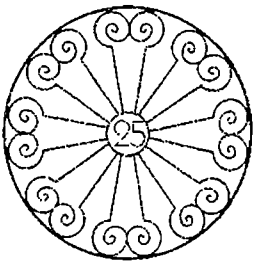
YCR LAW, LLP


Kathleen B. Barnes
Secretary

Enclosures

(all via US mail and email)

Cc: Chad A. McGowen, Esquire, McGowan, Hood & Felder, LLC
Eye S. Goodstein, Esquire, McGowan, Hood & Felder, LLC
John Gressette Felder, Jr., Esquire, McGowan, Hood & Felder, LLC



YCR LAW

Young Clement Rivers, LLP

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Community Association Law • Construction Law
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Special Task Litigation • Tax, Estate Planning and Probate
Trucking and Transportation • Workers' Compensation

THE FOLLOWING PAGES ARE FOR IMMEDIATE DELIVERY

To: 18037341839
From: kbarnes@ycrlaw.com
Date: August 16, 02:43:18 PM EDT
Subj: Murphy v. Hunt Valley, et al
Pages: 7

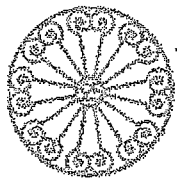
Good afternoon,

Attached please find correspondence regarding our motion for extension in the above-referenced matter. The original together with all copies and our filing fee has been placed in the mail. Please do not hesitate to let me know if you need anything further.

Thank you!

Katy B. Barnes
Commercial Litigation Secretary to
Stephen L. Brown, Joanna B. Stroud and Russell G. Hines
YCR LAW
25 Calhoun Street, Suite 400
Charleston, SC 29401
Phone: (843) 724-6610
Fax: (843) 579-1369

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YCR LAW
25 Calhoun Street • Suite 400 • Charleston, SC 29401
www.ycrlaw.com

Charleston Office
25 Calhoun Street, Suite 400 * Charleston, SC 29401
P.O. Box 993 * Charleston, SC 29402-0993

TELEPHONE: (843) 577-4000
WEBSITE: www.ycrlaw.com