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

Appeal from York County
Court of Common Pleas

William A. McKinnon, Circuit Court Judge

Case No. 2018-CP-46-01459

RECEIVED
SEP 11 2019
SC Court of Appeals

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.

**THIRD 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.

1. Presently, by order of this Court filed August 28, 2019, the deadline for Appellants' initial reply brief and designation of matter is September 5, 2019.

2. Appellants' counsel recognizes the notice in the Court's August 28, 2019 order that no further extensions will be granted absent extraordinary circumstances.

3. The present September 5th deadline falls on the day that Hurricane Dorian is expected to be just off coast of South Carolina, including Appellants' counsel's office located near the Charleston harbor.

4. Mr. Hines had hoped to be able to complete the brief so that it would be filed/served by Thursday, September 5, 2019, but on account of work-related and other time commitments, and the need to prepare for the approach of Hurricane Dorian, he is unable to do so, and he humbly asks that the Court consider the circumstances (approach of a Hurricane) 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 September 16, 2019, to file/serve their initial reply brief and designation of matter to be included in the record on appeal. Further, Appellants respectfully request that this Court hold their present initial reply briefing/designation of matter deadline in abeyance until it acts upon this motion.

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)
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Attorneys for Appellants

Charleston, South Carolina

Dated: 9/3/2019

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Defendants,

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Appellants.

PROOF OF SERVICE

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
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(843) 720-5488

Attorneys for Appellants

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellants, hereby certify that the foregoing **THIRD 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 September 3, 2019, properly posted for delivery to the following addressees:

9 - RGH 9/9/19

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 by ^{self} w/ signature

Russell G. Hines (SC Bar No. 72100)

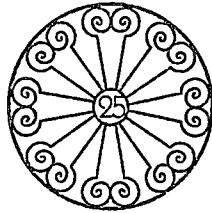
Attorneys for Appellants

Charleston, South Carolina

Dated: 9-3-2019

PLEASE NOTE: The foregoing was originally taken to the post office on 9/3/19, but the post office was unexpectedly closed (and not accepting mail) because of Hurricane Dorian.

Russell G. Hines
Russell G. Hines 9/9/19



YCR LAW

Aimee M. Justman
Legal Assistant

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September 3, 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
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 Third Motion for Extension of Time to File/Serve Initial Reply 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

Aimee M. Justman
Legal Assistant

RECEIVED
SEP 11 2019
SC Court of Appeals

/amj

(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

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South Carolina Court of Appeals
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