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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

OCT 23 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.

**MOTION FOR EXTENSION OF TIME TO
FILE/SERVE RECORD ON APPEAL**

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
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 the record on appeal in this matter.

1. Appellants' initial reply brief was filed on September 19, 2019. Therefore, pursuant to Rule 210(a), SCACR, the deadline for the record on appeal is today, October 21, 2019.

2. Appellants are represented in this matter by Young Clement Rivers, LLP ("YCR").

3. Among the YCR attorneys who have appeared on behalf of Appellants are Perry M. Buckner, IV, and J. Joseph Owens.

4. Both Messrs. Buckner and Owners have recently left YCR to practice with other firms, however.

5. The undersigned is in the process of obtaining the necessary signatures to petition the Court to allow Messrs. Buckner and Owens to withdraw as counsel of record, and the undersigned believes it is prudent that this be done before the record on appeal is filed.

6. Appellants, therefore, respectfully request that this deadline be extended by 30 days (from October 21, 2019), i.e., through November 20, 2019.

7. 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 30 days' time to file/serve the record on appeal. With the extension requested herein, the new deadline for filing/serving the record on appeal would be November 20, 2019, according to the undersigned's calculations. Further, Appellants respectfully request that the Court hold the present record on appeal deadline in abeyance until it acts upon this motion. Finally, Appellants also request that the Court accept this motion without the names of Messrs. Buckner and Owens appearing in the caption and signature line, due to the fact that, as stated herein, they no longer practice with YCR.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By:



Stephen L. Brown (SC Bar No. 66468)

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

Russell G. Hines (SC Bar No. 72100)

25 Calhoun Street, Suite 400

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P.O. Box 993 (29402)

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Attorneys for Appellants

Charleston, South Carolina

Dated: 10/21/19

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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)
Russell G. Hines (SC Bar No. 72100)
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Charleston, South Carolina 29401
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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 **MOTION FOR EXTENSION OF TIME TO FILE/SERVE RECORD ON APPEAL** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on October 21, 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

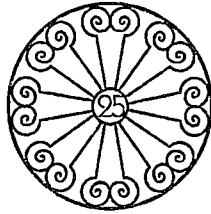
By: 

Russell G. Hines (SC Bar No. 72100)

Attorneys for Appellants

Charleston, South Carolina

Dated: 10/21/19



YCR LAW

Kathleen B. Barnes
Secretary

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

October 21, 2019

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 please find the original and seven (7) copies of a Motion for Extension of Time to File/Serve Record on Appeal, the original and one (1) copy of the Proof of Service of same and our firm's check in the amount of \$25.00 representing the filing fee.

Please file the originals and return court-stamped copies of each to me in the enclosed envelope.

With best wishes and kindest regards, I am

Sincerely,

YCR LAW, LLP

Kathleen B. Barnes
Secretary

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OCT 23 2019
SC Court of Appeals

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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