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

Appeal from Spartanburg County  
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

Case No. 2018-CP-42-04405

The Estate of Mary Solesbee, by her personal  
representative, Connie Bayne,

Respondent,

v.

Fundamental Clinical and Operational Services, LLC;  
Fundamental Administrative Services, LLC; THI of  
South Carolina at Magnolia Manor-Inman, LLC d/b/a  
Magnolia Manor-Inman; Inpatient Consultants of North  
Carolina, P.C.; and Angela Brown, ACNP,

**RECEIVED**

JAN 27 2020

SC Court of Appeals  
Defendants,

Of whom Fundamental Clinical and Operational  
Services, LLC; Fundamental Administrative Services,  
LLC; and THI of South Carolina at Magnolia Manor-  
Inman, LLC d/b/a Magnolia Manor-Inman 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)  
Russell G. Hines (SC Bar No. 72100)  
Gaillard T. Dotterer, III (SC Bar No. 103620)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29402  
P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Appellants*

COME NOW Appellants Fundamental Clinical and Operational Services, LLC; Fundamental Administrative Services, LLC; and THI of South Carolina at Magnolia Manor-Inman, LLC d/b/a Magnolia Manor-Inman, 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 December 27, 2019, the deadline for Appellants' initial brief and designation of matter is Monday, January 27, 2020. On account of work-related and other time commitments, Appellants respectfully request that this deadline be extended by 30 days (from January 27, 2020), i.e., through Wednesday, February 26, 2020. Respectfully, Appellants believe that this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondents.

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 Wednesday, February 26, 2020, 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.

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)

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*Attorneys for Appellants*

Charleston, South Carolina

Dated: 1/23/20

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Defendants,

Of whom Fundamental Clinical and Operational  
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Inman, LLC d/b/a Magnolia Manor-Inman are

Appellants.

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**PROOF OF SERVICE**

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YOUNG CLEMENT RIVERS, LLP

Stephen L. Brown (SC Bar No. 66468)

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

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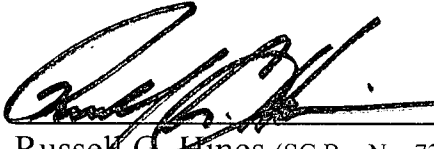
(843) 720-5488

*Attorneys for Appellants*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellants, hereby certify that the foregoing **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 the same in the U.S. Mail on January 23, 2020, properly posted for delivery to the following addressees:

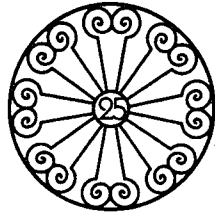
W. Harold Christian, Jr., Esquire  
Matthew W. Christian, Esquire  
Christian & Davis, LLC  
P.O. Box 332  
Greenville, SC 29602  
*Attorneys for Respondent*

Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

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

Charleston, South Carolina

Dated: 1/23/20



# YCR LAW

Kathleen B. Barnes  
Secretary

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E-mail: kbarnes@ycrlaw.com

January 23, 2020

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

Re: The Estate of Mary Solesbee, by her personal representative, Connie Bayne vs.  
Fundamental Clinical and Operational Services LLC, et al.  
Appellate Case No.: 2019-001731  
Case No.: 2019-001731  
Claim No.: HBLM# 1825909  
YCR File: 14347-20180793

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JAN 27 2020

SC Court of Appeals

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of a Motion for Extension of Time to File/Serve Initial 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 filed-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

Enclosures

(via US Mail and email)

Cc: W. Harold Christian, Jr., Esquire, Christian & Davis, LLC  
Matthew W. Christian, Esquire, Christian & Davis, LLC

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01/23/2020

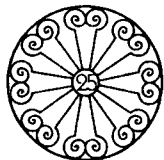
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