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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Robin B. Stillwell, Circuit Court Judge

Appellate Case No. 2019-000887

Estate of Mozana Clinkscales by and through the appointed Personal Representative Charlie E. Clinkscales, Individually, and on behalf of Statutory Beneficiaries, ..... Respondent

v.

Fundamental Clinical and Operational Services, LLC; Fundamental Administrative Services, LLC; and THI of South Carolina at Magnolia Place at Greenville, LLC d/b/a Magnolia-Place Greenville, ..... Appellants.

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SC Court of Appeals

**MOTION FOR EXTENSION OF TIME TO  
FILE RESPONDENT'S INITIAL BRIEF**

Pursuant to Rule 263 of the South Carolina Rules of Appellate Procedure, Respondent Charlie E. Clinkscales, Individually and as Personal Representative of the Estate of Mozana Clinkscales, moves for a thirty-day extension of time to file Respondent's Initial Brief. The current deadline is February 10, 2019 and the proposed extended deadline would be March 10, 2020. This is Respondent's first extension request. A \$50.00 motion fee check is enclosed.

Respectfully submitted,



Gary W. Poliakoff  
Raymond P. Mullman, Jr.  
Poliakoff & Associates, PA  
215 Magnolia Street  
Spartanburg, SC 29306

Jordan C. Calloway  
McGowan, Hood & Felder, LLC  
1539 Health Care Drive  
Rock Hill, SC 29732  
(803) 327-7800  
jcalloway@mcgowanhood.com

Rock Hill, SC  
February 4, 2020

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By and through the appointed  
Personal Representative Charlie  
E. Clinkscales, Individually, and  
On the behalf of Statutory Beneficiaries

..... Respondent

v.

Fundamental Clinical and Operational  
Services, LLC; Fundamental Administrative  
Services, LLC; and THI of South Carolina  
At Magnolia Place at Greenville, LLC d/b/a  
Magnolia-Place Greenville

..... Appellants

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**CERTIFICATE OF SERVICE**

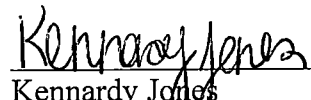
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The undersigned hereby certifies that on this 4<sup>th</sup> day of February, 2020, she served counsel for the Defendants with a copy of the Motion for Extension of Time to File Respondent's Initial Brief in this matter by mailing a copy of the same by United States Mail with first class postage prepaid to the following addresses:

Perry M. Buckner, IV  
Donald J. Davis, Jr.  
John J. Owens  
Young Clement Rivers, LLP  
PO Box 993

Honorable Jenny Abbott Kitchings  
SC Court of Appeals Clerk of Court  
1220 Senate Street  
Columbia, SC 29201

Charleston, SC 29402

  
Kennardy Jones  
Paralegal to Jordan Calloway

# McGowan, Hood & Felder, LLC

Chad A. McGowan (SC,GA,NC)  
S. Randall Hood  
John G. Felder, Jr.  
W. Jones Andrews, Jr.  
Russell T. Burke  
Jordan C. Calloway  
Susan F. Campbell  
Deborah Casey (NC)\*  
Ashley White Creech  
Shawn B. Deery  
Chance M. Farr (SC,NC)



Eve S. Goodstein  
Whitney B. Harrison  
Patrick M. Killen  
Anna S. Magann  
Robert V. Phillips  
Ranee Saunders  
James L. Ward, Jr. (SC,NC)  
James Stephen Welch (SC,OK)\*  
Jay F. Wright  
Joseph G. Wright, III\*  
\*Of Counsel

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SC Court of Appeals

Honorable Jenny Abbott Kitchings  
SC Court of Appeals Clerk of Court  
1220 Senate Street  
Columbia, SC 29201

Re: Estate of Mozana Clinkscales, et al. v. Fundamental Clinical and Operational Services, LLC, et al.  
Appellate Case No. 2019-000887

Dear Mrs. Kitchings:

Please find enclosed for filing one (1) original and one (1) copy of Notice of Appearance of Jordan Calloway and Motion for Extension of Time to File Respondent's Initial Brief in the above-referenced matter. Return the filed copies in the enclosed envelope. Also enclosed is our firm's check in the amount of \$50 to cover the filing fee.

If you have any questions, feel free to contact our office.

Sincerely,

A handwritten signature in cursive script that reads "Jordan C. Calloway".

Jordan C. Calloway

JCC/ksj

cc: Perry M. Buckner, IV, Esquire  
Donald J. Davis, Jr., Esquire  
John J. Owens, Esquire

MCCOWAN, HOOD & FELDER, LLC

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1539 Health Care Drive  
Rock Hill, SC, 29732



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Honorable Jenny Abbott Kitchings  
SC Court of Appeals Clerk of Court  
1220 Senate Street  
Columbia, SC 29201