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

Appeal from Greenville County  
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

**RECEIVED**

MAR 23 2020

SC Court of Appeals

Case No. 2018-CP-23-05088  
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,

Respondents,

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.

**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)  
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*

NOW COME Appellants, 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, 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.

Presently, in accordance with Rule 208(a)(3), the deadline for Appellants' initial reply brief and designation of matter is Friday, March 20, 2020. On account of work-related and other time commitments, Appellants respectfully request that this deadline be extended by 10 days (from March 20, 2020), i.e., through March 30, 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 extension of 10 days' additional time to file/serve their initial reply brief and designation. With the extension requested herein, the new deadline for filing/serving Appellants' initial reply brief and designation would be March 30, 2020, according to the undersigned's calculations. Further, Appellants respectfully request that the Court hold their present initial-briefing/designation deadline in abeyance until it acts on this motion.

*[Signature on next page]*

*[Signature page for Motion for Extension of Time to File/Serve Initial Reply Brief  
of Appellants, Appellate No. 2019-000887]*

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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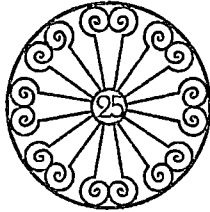
(843) 720-5488

*Attorneys for Appellants*

Charleston, South Carolina

Dated:

3/19/20



# YCR LAW

Aimee M. Justman  
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March 19, 2020

MAR 23 2020

SC Court of Appeals

**VIA US MAIL AND FASCIMILE**

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

Re: Estate of Mozana Clinkscales, by and through the appointed Personal Representative Charlie E. Clinkscales, Individually and on behalf of Statutory Beneficiaries vs. Fundamental Clinical and Operational Services, LLC, Fundamental Administrative Services, LLC; THI of South Carolina at Magnolia Place at Greenville, LLC, d/b/a Magnolia Place-Greenville; and Rusty Flathmann  
Appellate Case No.: 2019-000887  
Case No.: 2018-CP-23-05088  
Claim No.: HBLM#1624932  
YCR File: 14347-20160580

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of a 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 to me in the enclosed envelope. With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Aimee M. Justman  
Paralegal

/amj

Enclosures

cc: Matthew W. Christian, Christian & Davis LLC  
Gary W. Poliakoff, Esquire, Poliakoff & Associates, P.A.  
Raymond P. Mullman, Jr., Esquire, Poliakoff & Associates, P.A.

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SC Court of Appeals

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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.

**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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P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Appellants*

I, Russell G. Hines, of Young Clement Rivers, LLP, attorney 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 March 19, 2020, properly posted for delivery to the following addressees:

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

*and*

Matthew W. Christian, Esquire  
Christian & Davis, LLC  
1007 E. Washington Street  
Greenville, SC 29601

*Attorneys for Respondents*

Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

By:   
Russell G. Hines (SC Bar No. 72100)

*Attorneys for Appellants*

Charleston, South Carolina

Dated: 3/19/20

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\$002.00

**FIRST CLASS MAIL**

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

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20160580  
Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

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