

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

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Appeal from Greenville County  
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

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Case No. 2018-CP-23-05088  
Appellate Case No. 2019-000887

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APR 23 2020

SC Court of Appeals

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.

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**SECOND MOTION FOR EXTENSION OF TIME TO  
FILE/SERVE INITIAL REPLY BRIEF OF APPELLANTS**

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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.

By order of this Court filed March 24, 2020, the deadline for Appellants' initial reply brief and designation of matter was March 30, 2020. Based on the Supreme Court's Order filed March 20, 2020 (re: Operation of the Appellate Courts During the COVID-19 Emergency) extending the deadline by 20 days, the present deadline is today, April 20, 2020. On account of work-related and other time commitments, Appellants respectfully request that this deadline be extended by 10 days (from April 20, 2020), i.e., through April 30, 2020. Respectfully, Appellants believe that this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondents.

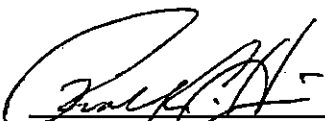
WHEREFORE, Appellants move this Honorable Court to grant them an extension of 10 days' additional time to file/serve their initial reply brief and designation. With the extension requested herein, the new deadline for filing/serving Appellants' initial reply brief and designation would be April 30, 2020, 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 page for Second 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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*Attorneys for Appellants*

Charleston, South Carolina

Dated: 4/20/20

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

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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)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
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(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 April 20, 2020, properly posted for delivery to the following addressees:

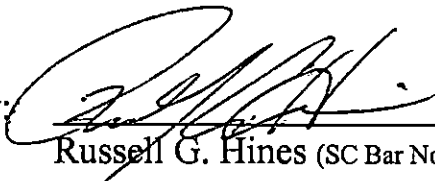
Gary W. Poliakoff, Esquire  
Raymond P. Mullman, Jr., Esquire  
Poliakoff & Associates, PA  
215 Magnolia Street  
Spartanburg, SC 29306

*and*

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

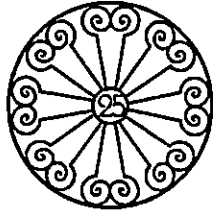
*Attorneys for Respondents*

Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

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

Charleston, South Carolina

Dated: 4/20/20



# YCR LAW

Russell G. Hines  
Partner

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April 20, 2020

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SC Court of Appeals

**VIA FACSIMILE AND U.S. MAIL**

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

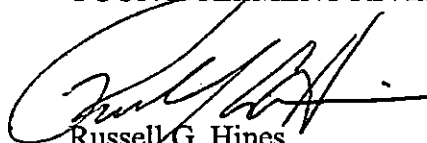
Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter please find the original and one copy of a Second Motion for Extension of Time to File/Serve Initial Reply Brief of Appellants. Also enclosed is the original and one copy of the proof of service regarding the same. It is my understanding that no filing fee is necessary nor additional copies of the motion or proof of service. If additional copies are needed please let me know.

Kindly return one stamped copy to me in the envelope provided. With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP



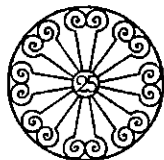
Russell G. Hines  
Partner

RGH/pbb  
Enclosures

cc via e-mail and U.S. mail: 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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