

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

---

Appeal from Greenville County  
Court of Common Pleas  
Robin B. Stilwell, Circuit Court Judge

---

Appellate Case No. 2019-001955  
Case No. 2019-CP-23-00473

---

**RECEIVED**  
**Apr 28 2020**  
**SC Court of Appeals**

The Estate of Patricia Royston, by and through  
the appointed personal representative, Marianne McCoig,  
individually and on behalf of the statutory beneficiaries,

Respondent,

v.

Hunt Valley Holdings, LLC,  
a/k/a Fundamental Long Term Care Holdings, LLC;  
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 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)  
Kate C. Mettler (SC Bar No. 103762)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29402  
P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Appellants*

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

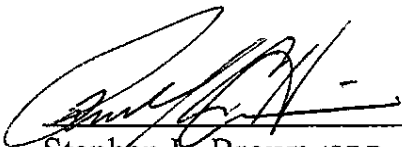
COME NOW Appellants Hunt Valley Holdings, LLC a/k/a Fundamental Long Term Care Holdings, LLC, Fundamental Clinical and Operational Services, LLC, Fundamental Administrative Services, LLC, and THI of South Carolina at Magnolia Place at Greenville, LLC, d/b/a Magnolia Place-Greenville, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an extension of 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 March 12, 2020, the deadline for Appellants' initial brief and designation of matter was April 10, 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 Thursday, April 30, 2020. On account of work-related and other time commitments, Appellants respectfully request that this deadline be extended by 30 days (from April 30, 2020), i.e., through June 1, 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 June 1, 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)

Kate C. Mettler (SC Bar No. 103762)

25 Calhoun Street, Suite 400

Charleston, South Carolina 29402

P.O. Box 993 (29402)

(843) 720-5488

*Attorneys for Appellants*

Charleston, South Carolina

Dated: 4/28/20

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

---

Appeal from Greenville County  
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

---

Case No. 2019-CP-23-00473

---

The Estate of Patricia Royston, by and through  
the appointed personal representative, Marianne McCoig,  
individually and on behalf of the statutory beneficiaries,

Respondent,

v.

Hunt Valley Holdings, LLC,  
a/k/a Fundamental Long Term Care Holdings, LLC;  
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)

Russell G. Hines (SC Bar No. 72100)

Kate C. Mettler (SC Bar No. 103762)

25 Calhoun Street, Suite 400

Charleston, South Carolina 29402

P.O. Box 993 (29402)

(843) 720-5488

*Attorneys for Appellants*

**RECEIVED**

**Apr 28 2020**

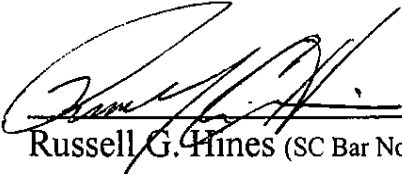
**SC Court of Appeals**

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 April 28, 2020, properly posted for delivery to the following addressees:

Gary W. Poliakoff, Esquire  
Raymond P. Mullman, Jr., Esquire  
Poliakoff & Associates, P.A.  
P.O. Box 1571  
Spartanburg, South Carolina 29304  
*Attorneys for Respondent*

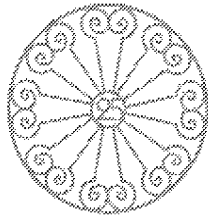
Matthew W. Christian, Esquire  
Christian & Davis, LLC  
P.O. Box 332  
Greenville, South Carolina 29602  
*Attorneys for Respondent*

Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

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

Charleston, South Carolina

Dated: 4/28/20



# YCR LAW

Pollyana Bell  
Project Assistant

Direct Dial: (843) 724-6616  
Direct Fax: (843) 579-1369  
E-mail: pbell@ycrlaw.com

April 28, 2020

**RECEIVED**

**Apr 28 2020**

**SC Court of Appeals**

**VIA FACSIMILE AND US MAIL**

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

Re: Estate of Patricia Royston, by and through the appointed Personal Representative, Marianne McCoig, Individually, and on behalf of the statutory beneficiaries, Respondent v. Hunt Valley Holdings, LLC a/k/a Fundamental Long Term Care Holdings, LLC; 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  
Appellate Case No. 2019-001955  
Case No.: 2019-001955  
Claim No.: HBLM# 1725803  
YCR File: 14347-20180896

Dear Ms. Kitchings:

Please find enclosed an original and one (1) copy of a Motion for Extension of Time to File/Serve Initial Brief of Appellants as well as the original and one (1) Proof of Service. Kindly return one (1) court stamped copy to us in the self-addressed envelope.

If additional copies or a filing fee are needed please let us know. With best wishes and kindest regards, I am

Sincerely,

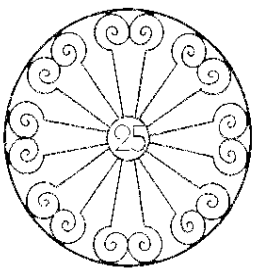
YOUNG CLEMENT RIVERS, LLP

Pollyana Bell  
Project Assistant

/pbb

Enclosures

cc via e-mail and US mail: Matthew W. Christian, Christian & Davis LLC  
Gary W. Poliakoff, Esquire, Poliakoff & Associates, P.A.  
Raymond P. Mullman, Jr., Esquire, Poliakoff & Associates, P.A.



# YCR LAW

Young Clement Rivers, LLP

All Business, Insurance, Real Estate and Regulatory Matters  
Admiralty/Marine • Appellate • Commercial Litigation  
Commercial Real Estate • Commercial Transactions  
Community Association Law • Construction Law  
Employment and Labor Law • Health Care • Insurance Coverage  
Products Liability • Professional Liability • Retail Liability  
Special Task Litigation • Tax, Estate Planning and Probate  
Trucking and Transportation • Workers Compensation

**THE FOLLOWING PAGES ARE FOR IMMEDIATE DELIVERY**

To: 18037341839  
From: pbell@ycrlaw.com  
Date: April 28, 02:41:26 PM EDT  
Subj: Appeal No. 19-1955; Royston v. THI  
Pages: 7

Please find the attached motion for filing in the above-referenced matter. A hard copy is being placed in the mail. If there are any issues with this filing please let us know.

Thank you,  
Pollyana Bell  
Project Assistant  
Commercial Litigation Practice Group  
Phone:(843)720-5488 | Fax:(843)579-1369

**RECEIVED**  
**Apr 28 2020**  
**SC Court of Appeals**



In view of current conditions and for the foreseeable future, YCR will be operating pursuant to its plan for continuous business services. With the imperative of safety in mind, our attorneys and staff will be working remotely as well as in our offices. In any event, we expect and intend to be able to respond in a timely manner to the needs and the requirements of clients, courts, colleagues, and friends. Thank you.

Young Clement Rivers, LLP  
<http://www.ycrlaw.com>  
Charleston: (843) 577-4000

Attachments larger than 40MB may be rejected by the firm's server. If you are sending an attachment of this size or larger, please contact the intended recipient to inform him/her of your transmission.

"ATTORNEY-CLIENT PRIVILEGED; DO NOT FORWARD WITHOUT PERMISSION." The information contained in this transmission is privileged and confidential. It is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone or by email to [email@ycrlaw.com](mailto:email@ycrlaw.com) or by replying to this message and destroy all copies of this message and all attachments.

Charleston Office  
25 Calhoun Street, Suite 400 \* Charleston, SC 29401  
P.O. Box 993 \* Charleston, SC 29402-0993

TELEPHONE: (843) 577-4000  
WEBSITE: [www.ycrlaw.com](http://www.ycrlaw.com)