

**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,

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,

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May 22 2020

SC Court of Appeals
Respondent,

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 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)
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 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.

In accordance with Rule 208(a)(3), and the Supreme Court's order of March 30, 2020, regarding Operation of the Appellate Courts During the Coronavirus Emergency (extending the due dates for all appellate court filings due on or after March 20, 2020, by twenty (20) days, the present deadline for Appellants' initial reply brief and designation of matter is Tuesday, May 26, 2020. On account of work-related and other time commitments, Appellants respectfully request that this deadline be extended by ten (10) days (from May 26, 2020), i.e., through Friday, June 5, 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 ten (10) days' time to file/serve their initial reply 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 reply brief and designation of matter would be Friday, June 5, 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)
Gaillard T. Dotterer, III (SC Bar No. 103620)
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Attorneys for Appellants

Charleston, South Carolina

Dated: 5/22/20

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Defendants,

Of whom Fundamental Clinical and Operational
Services, LLC; Fundamental Administrative Services,
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Appellants.

PROOF OF SERVICE


YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
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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 REPLY 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 May 22, 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

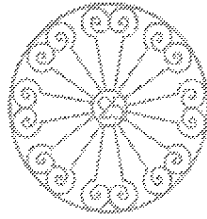
Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: 

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

Charleston, South Carolina

Dated: 5/22/20



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Pollyana Bell
Project Assistant

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May 22, 2020

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SC Court of Appeals

VIA FACSIMILE & US MAIL

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; 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 Defendants
Of which 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 the Appellants
Appellate Case No.: 2019-001731
Case No.: 2019-001731
Claim No.: HBLM# 1825909
YCR File: 14347-20180793

Dear Ms. Kitchings:

Please find enclosed an original and one (1) copy of a Motion for Extension of Time to File/Serve Initial Reply 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,

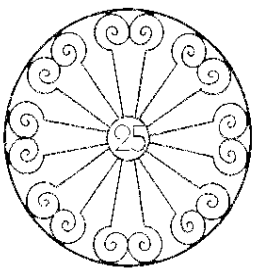
YOUNG CLEMENT RIVERS, LLP

Pollyana Bell
Project Assistant

/pbb

Enclosures

cc via e-mail and US mail: W. Harold Christian, Jr., Esquire
Matthew W. Christian, Esquire



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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
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THE FOLLOWING PAGES ARE FOR IMMEDIATE DELIVERY

To: 18037341839
From: pbell@ycrlaw.com
Date: May 22, 11:46:36 AM EDT
Subj: Appeal No. 2019-001731; Solesbee v. THI
Pages: 7

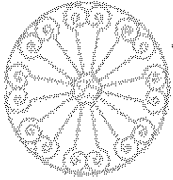
RECEIVED

May 22 2020

SC Court of Appeals

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



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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
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