

**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

RECEIVED

JUN 19 2020

SC Court of Appeals

The Estate of Mary Solesbee, by her personal
representative, Connie Bayne,

Respondent,

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,

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.

**THIRD 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 a final extension through Friday, June 19, 2020, to file/serve their initial reply brief and corresponding designation of matter to be included in the record on appeal.

1. By order of this Court filed May 26, 2020, in response to Appellants' first motion for an extension of the subject deadline, the deadline for Appellants' initial reply brief and designation of matter was extended to Friday, June 5, 2020.

2. On account of work-related and other time commitments, on June 4, 2020, Appellants filed/served a second motion for an extension of the subject deadline, requesting that it be extended by through today, Monday, June 15, 2020.

3. To the best of Appellants' counsel's knowledge, Appellants' second motion for extension of the subject deadline has not yet been ruled on.

4. Though Appellants' counsel had hoped to be able to complete Appellants' initial reply brief nonetheless, Appellants' counsel was out of the office from June 8–14, 2020, for a longstanding family summer vacation, and has been unable to complete Appellants' initial reply brief.

5. Appellants' counsel hopes the Court will deem the aforementioned disruption to his normal work schedule sufficiently extraordinary to allow the

dispensation requested herein, which is the grant of a final extension of the subject deadline through this coming Friday, June 19, 2020.

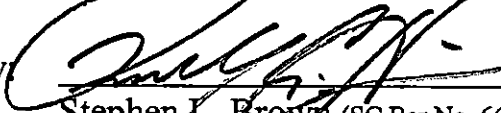
6. Respectfully, Appellants' counsel submits that this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellants move this Honorable Court to grant them a final extension of the subject deadline through this coming Friday, June 19, 2020, to file/serve their initial reply brief and corresponding designation of matter to be included in the record on appeal. 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)

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Attorneys for Appellants

Charleston, South Carolina

Dated: 6/15/20

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PROOF OF SERVICE

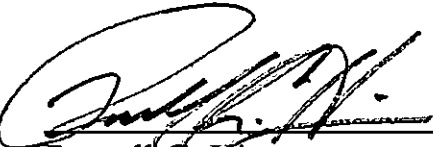
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Attorneys for Appellants

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellants, hereby certify that the foregoing **THIRD 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 June 15, 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

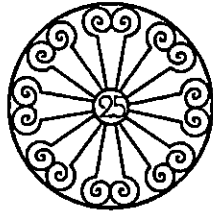
Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: 

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

Charleston, South Carolina

Dated: 6/15/20



YCR LAW

Pollyana Bell
Project Assistant

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June 15, 2020

VIA US MAIL

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

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Re: The Estate of Mary Solesbee, by her personal representative, **SC Court of Appeals**
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 Third 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

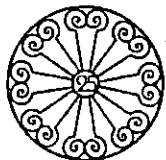
Pollyana Bell
Project Assistant

/pbb

Enclosures

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

Matthew W. Christian, Esquire



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