

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

Appeal from Spartanburg County
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

RECEIVED

JUN 29 2020

SC Court of Appeals

Case No. 2019-CP-42-03236

Appellate Case no. 2020-000357

Rita St. Aubin,
as Personal Representative of the Estate of Irene Ramsey,

Respondent,

v.

THI of South Carolina at Camp Care, LLC, d/b/a Lake Emory
Post Acute Care; THI of South Carolina, LLC; Hunt Valley
Holdings, LLC; THI of Baltimore, Inc.; and Casey Caddell, as
Officer/Manager of THI of South Carolina at Camp Care, LLC,
d/b/a Lake Emory Post Acute Care,

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)
Matthew O. Riddle (SC Bar No. 76650)
Russell G. Hines (SC Bar No. 72100)
Gaillard T. Dotterer, III (SC Bar No. 103620)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Appellants

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

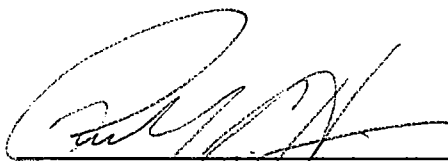
COME NOW Appellants THI of South Carolina at Camp Care, LLC, d/b/a Lake Emory Post Acute Care; THI of South Carolina, LLC; Hunt Valley Holdings, LLC; THI of Baltimore, Inc.; and Casey Caddell, as Officer/Manager of THI of South Carolina at Camp Care, LLC, d/b/a Lake Emory Post Acute Care, by and through 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 June 4, 2020, the deadline for Appellants' initial brief and designation of matter is June 26, 2020. On account of work-related and other time commitments, Appellants respectfully request that this deadline be extended by 30 days (from June 26, 2020), i.e., through July 27, 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 July 27, 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)
Matthew O. Riddle (SC Bar No. 76650)
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P.O. Box 993 (29402)
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Attorneys for Appellants

Charleston, South Carolina

Dated: 6/25/20

**THE STATE OF SOUTH CAROLINA
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Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

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Appellants.

PROOF OF SERVICE

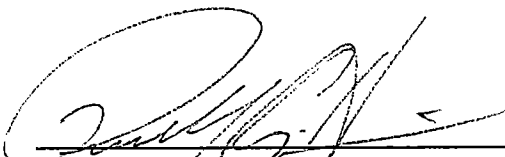
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Attorneys for Appellants

I, Russell G. Hines, of Young Clement Rivers, LLP, attorneys for Appellants, hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANT** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on June 25, 2020, properly posted for delivery to the following addressees:

Eric M. Poulin, Esquire
Roy T. Willey, IV, Esquire
Stefan B. Feidler, Esquire
Anastopoulo Law Firm, LLC
32 Ann Street
Charleston, SC 29403
Attorneys for Respondent

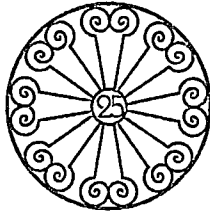
Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: 

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

Charleston, South Carolina

Dated: 6/25/20



YCR LAW

Pollyana Bell
Project Assistant

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June 25, 2020

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JUN 29 2020

SC Court of Appeals

VIA US MAIL

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

Re: Rita St. Aubin as Personal Representative of the Estate of Irene Ramsey
Respondent v. THI of South Carolina at Camp Care, LLC d/b/a Lake Emory Post
Acute Care; THI of South Carolina, LLC; Hunt Valley Holdings, LLC; THI of
Baltimore, Inc.; and Casey Caddell as Officer/Manager of THI of South Carolina
at Camp Care, LLC d/b/a Lake Emory Post Acute Care, Appellants.
Appellate Case no. 2020-000357
Case No.: 2020-000357
Claim No.: HBLM #: 1922072
YCR File: 14347-20190020

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

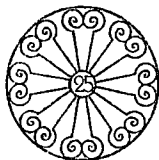
Sincerely,

YOUNG CLEMENT RIVERS, LLP

Pollyana Bell
Project Assistant

/pbb
Enclosures

cc(w/ encl. via US mail & e-mail): Eric M. Poulin, Esquire
Roy T. Willey IV, Esquire
Stefan B. Feidler, Esquire



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Young Clement Rivers, LLP

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South Carolina Court of Appeals
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