

**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

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Jul 10 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 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)
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 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.

Presently, in accordance with Rule 208(a)(3), the deadline for Appellants' initial reply brief and designation of matter is Friday, July 10, 2020. On account of work-related and other time commitments, Appellants respectfully request that this deadline be extended by 10 days (from July 10, 2020), i.e., through July 20, 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 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 July 20, 2020, according to the undersigned's calculations. Further, Appellants respectfully request that the Court

hold their present initial-reply-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
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(843) 720-5488

Attorneys for Appellants

Charleston, South Carolina

Dated: 7/10/20

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Robin B. Stilwell, Circuit Court Judge

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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)

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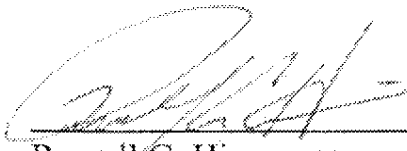
Attorneys for Appellants

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 July 10, 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

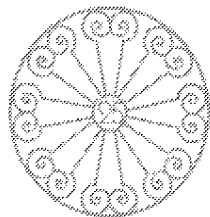
Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: 

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

Charleston, South Carolina

Dated: 7/10/20



YCR LAW

Pollyana Bell
Project Assistant

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July 10, 2020

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SC Court of Appeals

VIA FACSIMILE

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 Motion for Extension of Time to File/Serve Initial Reply Brief of Appellants and Proof of Service for filing in the above-referenced matter.

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

Sincerely,

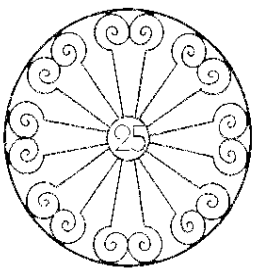
YOUNG CLEMENT RIVERS, LLP

Pollyana Bell
Project Assistant

/pbb

Enclosures

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



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Young Clement Rivers, LLP

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To: 18037341839
From: pbell@ycrlaw.com
Date: July 10, 10:24:58 AM EDT
Subj: Appeal No. 19-1955; Royston v. THI
Pages: 7

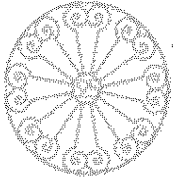
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SC Court of Appeals

Please find the attached motion for filing in the above-referenced matter. 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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