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**Jul 17 2020**

**SC Court of Appeals**

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

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Appeal from Greenville County  
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

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

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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,

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**SECOND MOTION FOR EXTENSION OF TIME TO  
FILE/SERVE INITIAL REPLY BRIEF OF APPELLANTS**

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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.

The Respondent served her initial brief on June 30, 2020; thereby, making the Appellants' initial reply briefing deadline July 10, 2020, according to Rule 208(a)(3), SCACR. Appellants filed their first motion for an additional 10-day extension of time, requesting extension of the deadline through July 20, 2020. This motion has not yet been acted upon by the Court. On account of work-related and other time commitments, Appellants respectfully request that this deadline be extended an additional 10 days (from July 20, 2020), i.e., through July 30, 2020. Respectfully, Appellants believe 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 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 30, 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)  
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*Attorneys for Appellants*

Charleston, South Carolina

Dated: 7/17/20

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Case No. 2019-CP-23-00473

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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**

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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)  
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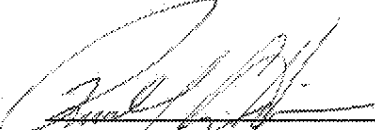
*Attorneys for Appellants*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellants, hereby certify that the foregoing **SECOND 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 17, 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*

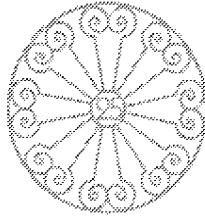
Matthew W. Christian, Esquire  
Christian & Davis, LLC  
P.O. Box 332  
Greenville, South Carolina 29602  
*Attorneys for Respondent*

Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

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

Charleston, South Carolina

Dated: 7/17/20



YCR LAW

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Project Assistant

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July 17, 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 Second 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,

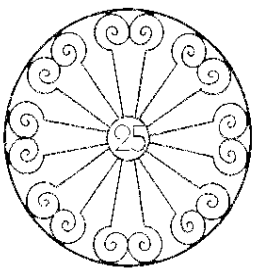
YOUNG CLEMENT RIVERS, LLP

Pollyana Bell  
Project Assistant

/pbb

Enclosures

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



# YCR LAW

Young Clement Rivers, LLP

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Special Task Litigation • Tax, Estate Planning and Probate  
Trucking and Transportation • Workers Compensation

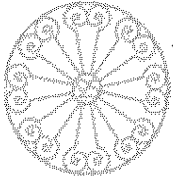
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To: 18037341839  
From: pbell@ycrlaw.com  
Date: July 17, 02:55:49 PM EDT  
Subj: Appeal No. 19-1955; Royston v. THI  
Pages: 7

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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



**YCR LAW**  
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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  
<http://www.ycrlaw.com>  
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