

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

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Appeal from Spartanburg County  
Court of Common Pleas  
Grace Gilchrist Knie, Circuit Court Judge

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Case No. 2019-CP-42-03075  
Appellate Case No. 2020-000500

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**RECEIVED**

**Aug 17 2020**

**SC Court of Appeals**

Betty Nanney,  
by and through her Attorney-in-Fact, Leslie Nanney,

Respondent,

v.

THI of South Carolina at Spartanburg, LLC,  
d/b/a Magnolia Manor-Spartanburg, Rusty Flathmann,  
Laura Anne Winn, and Olishia Gaffney,

Appellants.

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

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YOUNG CLEMENT RIVERS, LLP  
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D. Jay Davis, Jr. (SC Bar No. 12084)  
Russell G. Hines (SC Bar No. 72100)  
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*Attorneys for Appellants*

COME NOW Appellants, THI of South Carolina at Spartanburg, LLC d/b/a Magnolia Manor-Spartanburg, Rusty Flathmann, Laura Anne Winn, and Olishia Gaffney, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for a final extension of two (2) 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 July 20, 2020, the deadline for Appellants' initial brief and designation of matter is today, August 17, 2020. As it happened, August 17, 2020, coincided with an all-day mediation in another of the undersigned's cases as well as the briefing deadline in another of the undersigned's appeals. Though the undersigned attempted in good faith to complete Appellants' initial brief by today's deadline, he is in need of a small amount of additional time to do so and hopes that the Court will consider the confluence of the aforementioned deadlines to be sufficiently out of the ordinary to allow the relief requested herein, which relief, the undersigned humbly submits, 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 2 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 August 19, 2020. 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: s/Russell G. Hines  
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Charleston, South Carolina

August 17, 2020

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Appellants.

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**PROOF OF SERVICE**

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**YOUNG CLEMENT RIVERS, LLP**

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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 APPELLANTS** was served on all other parties to this matter by emailing the same (*see* attached copy of said email) to their counsel of record (identified below) on August 17, 2020:

Gary W. Poliakoff, Esquire  
Raymond P. Mullman, Jr., Esquire  
Edward John Waelde, Esquire  
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Spartanburg, SC 29304  
*Attorneys for Respondent*

Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

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

Charleston, South Carolina

August 17, 2020

**From:** [Hines, Russell](#)  
**To:** [atty@gpoliakoff.com](mailto:atty@gpoliakoff.com); [Ray Mullman](#); [Jwaelde@gpoliakoff.com](mailto:Jwaelde@gpoliakoff.com)  
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**Subject:** Nanney v. THI (Appellate Case No. 2020-000500) -- Appellants" Motion for Additional Briefing Extension  
**Date:** Monday, August 17, 2020 10:27:25 PM  
**Attachments:** [image001.png](#)  
[Nanney v. THI \(App. Case No. 2020-000500\) -- Appellants" Mot. for Briefing Ext. d. 8-17-20.pdf](#)

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Attached please find a motion for an additional extension of Appellants' initial briefing deadline in the above-referenced appeal. The motion will be filed with the Court of Appeals via separate email.

Russell G. Hines  
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