

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

Appeal from Spartanburg County
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

Appellate Case No. 2020-
Circuit Court Case No. 2018-CP-42-03421

RECEIVED

Oct 23 2020

SC Court of Appeals

Armando J. Acevedo, through his Attorney-in-Fact, Marianne
Acevedo,

Respondent,

v.

Hunt Valley Holdings, LLC; THI of South Carolina, LLC; and
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)
Russell G. Hines (SC Bar No. 72100)
Kate C. Mettler (SC Bar No. 103762)
25 Calhoun Street, Suite 400 (29401)
P.O. Box 993
Charleston, South Carolina 29402
(843) 720-5488

Attorneys for Appellants

COME NOW Appellants Hunt Valley Holdings, LLC, THI of South Carolina, LLC, and 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 October 6, 2020, the deadline for Appellants' initial brief and designation of matter is October 26, 2020. On account of work-related and other time commitments, Appellants respectfully request that this deadline be extended by 30 days (from October 26, 2020), i.e., through November 25, 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 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 November 25, 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 (S.C. 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 29401
P.O. Box 993 (29402)
(843) 720-5488
Attorneys for Appellants

Charleston, South Carolina

Dated: 10/23/20

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PROOF OF SERVICE

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 (29401)
P.O. Box 993
Charleston, South Carolina 29402
(843) 720-5488

Attorneys for Appellants

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellants, do hereby certify that Appellants' **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANTS** was served on all other parties to this appeal on October 23, 2020, via email (see attached) to their following counsel of record:

Gary W. Poliakoff, Esquire
Raymond P. Mullman, Jr., Esquire
Edward John Waelde, Esquire
Poliakoff & Associates, P.A.
P.O. Box 1571
Spartanburg, SC 29304


and

Patrick E. Knie, Esquire
Patrick E. Knie Law Offices
250 Magnolia Street
Spartanburg, SC 29306

Attorneys for Respondent

YOUNG CLEMENT RIVERS, LLP

By:



Russell G. Hines (SC Bar No. 72100)

Attorneys for Appellants

Charleston, South Carolina

Dated: 10/23/20

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Friday, October 23, 2020 12:16 PM
To: 'atty@gpoliakoff.com'; 'cary@gpoliakoff.com'; 'Amanda@gpoliakoff.com';
'Jwaelde@gpoliakoff.com'; 'mgabriel@knielaw.com'; 'pknie@knielaw.com';
'RMullmanjr@gmail.com'; 'shelley@gpoliakoff.com'
Cc: Hines, Russell; Justman, Aimee
Subject: Acevedo v. THI; Appellate Case No. 2020-001146
Attachments: Motion for Ext of time to File-Serve Initial Brief of Appellants.pdf

Attached please find Appellants' motion for an extension of time to file/serve their initial brief in the above-referenced case. The motion will be filed with the Court of Appeals via separate email.

Thank you,
Pollyana Bell
Project Assistant
Commercial Litigation Practice Group
Phone:(843)720-5488 | Fax:(843)579-1369



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