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**Jan 06 2021**

**SC Court of Appeals**

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

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Appeal from Spartanburg County  
Court of Common Pleas

J. Mark Hayes, II, Circuit Court Judge

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Appellate Case No. 2020-001107  
Case No. 2018-CP-42-03447

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Estate of Barbara Owens, by and through her Personal  
Representative, Mary Jane McCraw, Individually and on behalf of  
Statutory Beneficiaries,

Respondent,

v.

Fundamental Clinical and Operational Services, LLC;  
Fundamental Administrative Services, LLC; THI of South  
Carolina, LLC; THI Of South Carolina at Spartanburg, LLC d/b/a  
Magnolia Manor-Spartanburg,

Appellants.

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

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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*

COME NOW Appellants Fundamental Clinical and Operational Services, LLC, Fundamental Administrative Services, LLC, THI of South Carolina, LLC, and THI Of South Carolina at Spartanburg, LLC d/b/a Magnolia Manor-Spartanburg, 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 December 7, 2020, the deadline for Appellants' initial brief and designation of matter is January 6, 2021. On account of work-related and other time commitments, Appellants respectfully request that this deadline be extended by 30 days (from January 6, 2021), i.e., through February 5, 2021. Respectfully, Appellants believe that this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

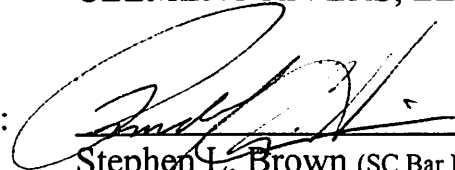
WHEREFORE, Appellants move this Honorable Court to grant them an additional extension of 30 days' time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving their initial brief and designation of matter would be February 5, 2021, 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.

*(Signature page for Motion for Extension of Time to File/Serve Initial Brief of Appellants, Appeal No. 2020-001107)*

Respectfully submitted,

CLEMENT RIVERS, LLP

By:



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Dated: 1/6/21