

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

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Appeal from Spartanburg County  
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

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Appellate Case No. 2020-001146  
Circuit Court Case No. 2018-CP-42-03421

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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.

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

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CLEMENT RIVERS, LLP  
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*Attorneys for Appellants*

**RECEIVED**

**Jan 28 2021**

**SC Court of Appeals**

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 ten (10) days' additional time to file/serve their initial reply brief.

Presently, in accordance with Rule 208(a)(3), the deadline for Appellants' initial reply brief is Friday, January 29, 2021. On account of work-related and other time commitments, Appellants respectfully request that this deadline be extended by 10 days (from January 29, 2021), i.e., through February 8, 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 10 days' time to file/serve their initial reply brief. With the extension requested herein, the new deadline for filing/serving their initial reply brief would be February 8, 2021, according to the undersigned's calculations. Further, Appellants respectfully request that the Court hold their present initial-reply-briefing deadline in abeyance until it acts upon this motion.

*(Signature on next page)*

*(Signature page for Motion for Extension of Time to File/Serve Initial Reply Brief  
of Appellants, Appeal No. 2020-001146)*

Respectfully submitted,

CLEMENT RIVERS, LLP

By:   
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Charleston, South Carolina

Dated: 1/28/21

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Post Acute Care,

Appellants.

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**PROOF OF SERVICE**

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I, Russell G. Hines, of Clement Rivers, LLP, counsel for Appellants, do hereby certify that Appellants' **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANTS** was served on all other parties to this appeal on January 28, 2021, via email (see attached) to their following counsel of record:

Gary W. Poliakoff, Esquire  
Raymond P. Mullman, Jr., Esquire  
Edward John Waelde, Esquire  
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*and*

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Spartanburg, SC 29306

*Attorneys for Respondent*

CLEMENT RIVERS, LLP

By:



\_\_\_\_\_  
Russell G. Hines (SC Bar No. 72100)

*Attorneys for Appellants*

Charleston, South Carolina

Dated: 1/28/21

**Bell, Pollyana (Polly)**

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**From:** Bell, Pollyana (Polly)  
**Sent:** Thursday, January 28, 2021 10:37 AM  
**To:** 'atty@gpoliakoff.com'; 'cary@gpoliakoff.com'; 'Jwaelde@gpoliakoff.com';  
'RMullmanjr@gmail.com'; 'amanda@gpoliakoff.com'; 'pknie@knielaw.com';  
'mgabriel@knielaw.com'  
**Cc:** Hines, Russell; Justman, Aimee  
**Subject:** Acevedo v. THI; Appellate Case No.: 2020-001146  
**Attachments:** Mtn for Ext of Time to file-serve Initial Reply Brief of Appellants.pdf

Attached please find Appellants' motion for extension of time to file/serve their initial reply brief in the above-referenced matter which is being filed today.

Thank you,  
Pollyana Bell  
Project Assistant  
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**Jan 28 2021**

**SC Court of Appeals**