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Nov 30 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Spartanburg County
Court of Common Pleas

The Honorable Grace Gilchrist Knie, Circuit Court Judge

Case No.: 2020-CP-42-03593
Appellate Case No. 2021-000707

Trina Dawkins,
as Personal Representative of the Estate of William Dawkins,

Respondent,

v.

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

Appellants.

**RESPONDENT'S MOTION TO EXTEND THE TIME TO FILE
AND SERVE INITIAL BRIEF AND DESIGNATION OF
MATTER ON APPEAL**

JORDAN LAW CENTER
William A. Jordan, III
(SC Bar No. 101271)
622 Wade Hampton Boulevard
Greenville, SC 29609
(864) 235-0147
william@jordanlawcenter.com

Attorney for Respondent

NOW COMES Trina Dawkins, as Personal Representative of the Estate of William Dawkins, Respondent, by and through her undersigned counsel, and, on the grounds set forth below, hereby moves this Honorable Court to grant her a first extension of 30 days' time to file and serve her initial brief and designation of matter to be included in the record on appeal.

The Appellants in this case filed and served their initial brief and designation of matter on appeal on November 1, 2021. Pursuant to Rules 208, 209, and 263, SCACR, the 30-day deadline for Respondent to file and serve her initial brief and designation of matter expires December 1, 2021. Respondent has thus far not asked for any extension of this deadline from the Court. On account of work-related and other time commitments, the undersigned requests that the Court extend the time for Respondent to file and serve her initial brief and designation of matter to be included in the record on appeal by 30 days from today, i.e., January 3, 2022.¹ The undersigned submits that the grant of such relief is consistent with the interests of justice and will not result in any

¹ 30 days falls on December 31, 2021, a federal holiday, and pursuant to Rule 263, SCACR, the next day that is neither Saturday, Sunday, nor a holiday is January 3, 2022.

undue prejudice or delay.

Wherefore, Respondent moves this Honorable Court to grant her an additional extension of 30 days' time to file and serve her initial brief and corresponding designation of matter to be included in the record on appeal. If the requested extension is granted, the new deadline for Respondents' initial brief and designation of matter to be included in the record on appeal will be January 3, 2022, according to the undersigned's calculations. *See* Rule 263, SCACR. Additionally, Respondent asks that the Court hold her initial deadline in abeyance until it rules upon this motion.

Respectfully submitted,

JORDAN LAW CENTER

s/William A. Jordan, III
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Attorneys for Respondent

Greenville, South Carolina

November 30, 2021

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THI of South Carolina at Spartanburg, LLC;
THI of South Carolina at Magnolia Manor-Spartanburg, LLC d/b/a Magnolia
Manor-Spartanburg,

Appellants.

PROOF OF SERVICE

JORDAN LAW CENTER
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Attorney for Respondent

I, William A. Jordan, III, of Jordan Law Center, attorney for Respondent, hereby certify that **RESPONDENT'S MOTION TO EXTEND THE TIME TO FILE/SERVE INITIAL BRIEF AND DESIGNATION OF MATTER ON APPEAL** was served on Appellants on November 30, 2021, by emailing (see attached email) a copy of the same to Appellants' counsel of record:

Russell G. Hines, Esquire
rhines@ycrlaw.com
CLEMENT RIVERS, LLP
25 Calhoun Street, Suite 400
Charleston, SC 29401

Attorneys for Appellants

Respectfully submitted,

JORDAN LAW CENTER

s/William A. Jordan, III
William A. Jordan, III
(SC Bar No. 101271)

Attorneys for Respondent

Greenville, South Carolina

November 30, 2021

2021-000707 (Dawkins v. Fundamental) - Respondent's Motion to Extend the Time to File and Serve Initial Brief and Designation of Matter on Appeal

1 message

Teri Lackey <teri@jordanlawcenter.com>
To: Rhines@ycrlaw.com
Cc: William Jordan <william@jordanlawcenter.com>

Tue, Nov 30, 2021 at 4:19 PM

Mr. Hines:

Please find attached ***Respondent's Motion to Extend the Time to File and Serve Initial Brief and Designation of Matter on Appeal*** regarding 2021-000707 (Dawkins v. Fundamental).

Thank you.

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Teri Lackey, Paralegal

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2 attachments

 **Dawkins, William - Respondent's Motion to Extend the Time to File and Serve Initial Brief and Designation of Matter on Appeal.pdf**
125K

 **Dawkins, William - Proof of Service.pdf**
74K