

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Spartanburg County  
Court of Common Pleas

The Honorable Grace Gilchrist Knie, Circuit Court Judge

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

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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.

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

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JORDAN LAW CENTER  
William A. Jordan, III  
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*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 an extension of 30 days' additional time to file and serve her initial brief and designation of matter to be included in the record on appeal.

Pursuant to the Court's Order filed December 1, 2021, the present deadline for Respondent's initial brief and designation of matter is due January 4, 2022. On account of work-related and other time commitments, the undersigned requests that the Court extend the time for Respondent to file/serve her initial brief and designation of matter by 30 days from January 4, 2022, to February 3, 2022. Most respectfully, the undersigned submits that the grant of such relief is consistent with the interests of justice and will not result in any 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 February 3, 2022, according to the undersigned's calculations. *See* Rule 263, SCACR. Additionally, Respondent asks that the Court hold the current 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

January 3, 2022

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**SC Court of Appeals**

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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.

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**PROOF OF SERVICE**

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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 January 3, 2022, by emailing (see attached email) a copy of the same to Appellants' counsel of record:

Russell G. Hines, Esquire  
[rhines@ycrlaw.com](mailto: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  
January 3, 2022



Teri Lackey <teri@jordanlawcenter.com>

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**Dawkins v. Fundamental (Appellate Case No. 2021-000707)**

1 message

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**Teri Lackey** <teri@jordanlawcenter.com>  
To: "Hines, Russell" <Rhines@ycrlaw.com>  
Cc: William Jordan <william@jordanlawcenter.com>

Mon, Jan 3, 2022 at 2:43 PM

Mr. Hines -

Attached please find Respondent's Motion to Extend the time to File and Serve Initial Brief and Designation of Matter on Appeal regarding Dawkins v. Fundamental (Appellate Case No. 2021-000707).

Thank you.

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**Teri Lackey, Paralegal**

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 **Dawkins, William - Respondent's 2nd Motion to Extend the Time to File:Serve Response to Initial Brief.pdf**  
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