

**RECEIVED**

**Feb 14 2022**

**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

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

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CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
James D. Gandy, III (SC Bar No. 11925)  
Russell G. Hines (SC Bar No. 72100)  
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(843) 720-5488

*Attorneys for Appellants*

COME NOW Appellants, 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, 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 and corresponding designation of matter to be included in the record on appeal.

Presently, in accordance with Rule 208(a)(3), SCACR, the deadline for Appellants' initial reply brief and any designation of matter is Monday, February 14, 2022. Because of work-related and other time commitments, Appellants respectfully request that this deadline be extended by 10 days (from February 14, 2022), i.e., through February 24, 2022. Respectfully, Appellants believe that this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondents.

WHEREFORE, Appellants move this Honorable Court to grant them an extension of 10 days' time to file/serve their initial reply brief and any 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 reply brief and any designation of matter would be February 24, 2022, according to the undersigned's calculations. Further, Appellants respectfully request that the

Court hold their present initial-reply-briefing/designation-of-matter deadline in  
abeyance until it acts upon this motion.

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
James D. Gandy, III (SC Bar No. 11925)  
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Charleston, South Carolina

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d/b/a Magnolia Manor-Spartanburg,

Appellants.

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**PROOF OF SERVICE**

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CLEMENT RIVERS, LLP  
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*Attorneys for Appellants*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF** was served on Respondent on February 14, 2022, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

William A. Jordan III, Esquire  
[william@jordanlawcenter.com](mailto:william@jordanlawcenter.com)  
JORDAN LAW CENTER, LLC  
622 Wade Hampton Boulevard  
Greenville, SC 29609  
*Attorney for Respondent*

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Russell G. Hines (SC Bar No. 72100)  
*Attorneys for Appellants*

Charleston, South Carolina

February 14, 2022

## **Bell, Pollyana (Polly)**

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**From:** Bell, Pollyana (Polly)  
**Sent:** Monday, February 14, 2022 1:46 PM  
**To:** Teri Lackey; William Jordan  
**Cc:** Justman, Aimee; Hines, Russell  
**Subject:** Dawkins v. Fundamental ; Appellate Case No. 2021-000707  
**Attachments:** Mtn for Ext for Initial Reply Brief.pdf

Enclosed please find Appellant's Motion for Extension of Time to File/Serve their Initial Reply Brief in the above-referenced matter which will be filed today.

Thank you,

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



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