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Feb 23 2022

SC Court of Appeals

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

Appeal from Spartanburg County
Court of Common Pleas

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.

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

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)
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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, 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, by order of this Court filed February 15, 2022, the deadline for Appellants' initial reply brief and any designation of matter is Thursday, February 24, 2022. Because of work-related and other time commitments, Appellants respectfully request that this deadline be extended by 10 days (from February 24, 2022), i.e., through March 7, 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 March 7, 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.

[Signature page for Motion for Extension of Time to File/Serve Initial Reply Brief, Appellate Case No. 2021-000707]

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Stephen L. Brown (SC Bar No. 66468)
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Appellants.

PROOF OF SERVICE

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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 23, 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
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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 23, 2022

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Wednesday, February 23, 2022 11:37 AM
To: Teri Lackey; William Jordan
Cc: Hines, Russell; Justman, Aimee
Subject: Dawkins v. Fundamental ; Appellate Case No. 2021-000707
Attachments: Mtn for Ext for Initial Reply Brief.pdf

Enclosed please find Appellants' 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
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