

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

Appeal from Charleston County
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

Supreme Court Case No. 2022-001286
Court of Appeals Case No. 2019-001413
Circuit Court Case No. 2018-CP-10-01251

Estate of Richard Ladson, Jr.,
by and through Personal Representative Richard Miles Ladson, Sr., POA,

Respondent,

v.

THI of South Carolina at Charleston, LLC
d/b/a Riverside Health and Rehab,

Petitioner.

**SECOND MOTION FOR EXTENSION OF TIME
TO SERVE/FILE PETITION FOR A WRIT OF CERTIORARI**

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Attorneys for Petitioner

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Sep 28 2022

S.C. SUPREME COURT

NOW COMES Petitioner, THI of South Carolina at Charleston, LLC d/b/a Riverside Health and Rehab, by and through its undersigned counsel, on the grounds stated below, pursuant to Rule 263(b), SCACR, as well as the Court's order of July 16, 2014, regarding Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals, and hereby moves for a second extension of ten (10) days' time to file/serve its petition to this Court for issuance of a writ of certiorari to the Court of Appeals to review its decision in this matter.

Presently, by order of this Court filed September 15, 2022, the deadline to file/serve a petition for writ of certiorari is September 29, 2022. Due to other time commitments, both work- and non-work-related, the undersigned counsel for Petitioner requests ten (10) additional days, beyond September 29, 2022, to prepare Petitioner's petition seeking this Court's review of the Court of Appeals' decision via writ of certiorari, and the undersigned submits that there is good cause to allow the requested dispensation: It is in furtherance of the interests of justice; it will not work any undue prejudice upon any other party; and it is consistent with the extension protocol established by the Court's aforementioned order of July 16, 2014.

WHEREFORE, Petitioner respectfully requests that this Honorable Court grant it an extension of ten (10) additional days' time to file/serve its petition for writ of certiorari. With the extension requested herein, the new deadline for

filing/serving a petition for writ of certiorari would be Monday, October 10, 2022, according to the undersigned's calculations. Further, Petitioner respectfully requests that the Court hold its present deadline in abeyance until it acts upon this motion.

Respectfully submitted,
CLEMENT RIVERS, LLP

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September 28, 2022