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**Sep 28 2022**

**SC Court of Appeals**

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

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Appeal from Charleston County  
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

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

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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.

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

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CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Petitioner*

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

By: s/Russell G. Hines  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
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*Attorneys for Petitioner*

Charleston, South Carolina

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**PROOF OF SERVICE**

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CLEMENT RIVERS, LLP  
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(843) 720-5488

*Attorneys for Petitioner*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioner, hereby certify that the **SECOND MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR A WRIT OF CERTIORARI** was served on Respondent, on September 28, 2022, by emailing (see attached) a copy of the same to Respondent's counsel of record:

Carl E. Pierce, II, Esquire  
[carlpierce@piercesloan.com](mailto:carlpierce@piercesloan.com)

Carl E. Pierce, III, Esquire  
[treypierce@piercesloan.com](mailto:treypierce@piercesloan.com)

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PIERCE, SLOAN, WILSON, KENNEDY & EARLY, LLC  
321 East Bay Street  
Charleston, South Carolina 29401

*Attorneys for Respondent*

I also certify that Petitioner's **SECOND MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR A WRIT OF CERTIORARI** and **PROOF OF SERVICE** was filed with the South Carolina Court of Appeals on September 28, 2022, via email (see attached) to [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org).

Respectfully submitted,  
CLEMENT RIVERS, LLP

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

*Attorneys for Petitioner*

Charleston, South Carolina

September 28, 2022

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Wednesday, September 28, 2022 3:55 PM  
**To:** 'carlpierce@piercesloan.com'; 'treypierce@piercesloan.com';  
'bensmoot@piercesloan.com'  
**Cc:** Hines, Russell; Justman, Aimee  
**Subject:** Ladson v. THI // Supreme Court Case No. 2022-001286; Court of Appeals Case No. 2019-001413  
**Attachments:** 2nd Mtn for Ext to Serve-File Petition for Writ of Cert.pdf

Enclosed please find Petitioner's Second Motion for Extension of Time to Serve/File Petition for a Writ of Certiorari which will be filed today in the above-referenced matter.

Thank you,

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



**CLEMENT RIVERS, LLP**  
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