

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

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S.C. SUPREME COURT

Appeal from Charleston County

Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

Circuit Court Case No. 2018-CP-10-01251

Court of Appeals Case No. 2019-001413

Unpublished Opinion No. 2022-UP-169 (S.C. Ct. App. Filed April 6, 2022)

Supreme Court Case No. 2022-001286

Estate of Richard Ladson, Jr.,

By and through Personal Representative

Richard Miles Ladson, Sr.

Respondent,

v.

THI of South Carolina at Charleston, LLC,

d/b/a Riverside Health and Rehab,

Petitioner.

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

PIERCE, SLOAN, KENNEDY, & EARLY,
LLC

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*Attorneys for Respondent Estate of Richard
Ladson, Jr., by and through Personal
Representative Richard Miles Ladson, Sr.*

NOW COMES Respondent, Estate of Richard Ladson, Jr., by and through Personal Representative Richard Miles Ladson, Sr., by and through its undersigned counsel, on the grounds stated below, pursuant to Rule 263(b), SCACR, and hereby moves for an extension of fourteen (14) days' time to file/serve its Return to Petition for Writ of Certiorari.

Presently, the deadline to file/serve a return to Petition for Writ of Certiorari is November 9, 2022. Due to other time commitments, both work- and non-work-related, the undersigned counsel for Respondent requests fourteen (14) additional days, beyond November 9, 2022, to prepare Respondent's return to 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.

WHEREFORE, Respondent respectfully requests that this Honorable Court grant it an extension of fourteen (14) additional days' time to file/serve its Return to Petition or Writ of Certiorari. With the extension requested herein, the new deadline for filing/serving a return to Petition for Writ of Certiorari would be Tuesday, November 22, 2022, according to the undersigned's calculations. Further, Respondent respectfully requests that the Court hold its present deadline in abeyance until it acts upon this motion.

[Signature Page to Follow]

Respectfully submitted,

PIERCE, SLOAN, KENNEDY & EARLY, LLC

By: *s/ Benjamin C. Smoot, II*
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Attorneys for Respondent

Charleston, South Carolina
November 8, 2022