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Dec 28 2022

S.C. SUPREME COURT

Case No. 2019-1322

THE STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

On appeal from the Court of Common Pleas, Charleston County

Wade H. Logan, III, Special Master

CHICORA LIFE CENTER, LLC,
Petitioner,

v.

Fetter Health Care Network Inc.,
NBSC Corp., and John and Jane Does 1-100,
of which
FETTER HEALTH CARE NETWORK INC. is the
Respondent.

**MOTION FOR EXTENSION OF TIME TO FILE
RETURN TO PETITION FOR CERTIORARI**

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ATTORNEYS FOR RESPONDENT

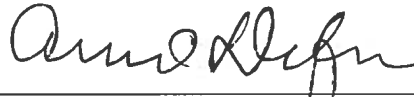
Respondent respectfully requests an extension of fifteen days in which to file its Opposition to the Petition for Certiorari, and states in support the following:

1. The Petition was filed and served on December 2, 2022, meaning that an Opposition would be due on January 2, 2023 (the first non-holiday following the thirtieth day after service). Granting this extension would make the due date Monday, January 16, 2023.
2. Although undersigned counsel have worked diligently to prepare the Opposition, its completion has been delayed by (1) the holiday season and (2) airline disruptions, which are currently stranding one of Respondent's principal counsel out of state for nearly a week.
3. Petitioner's counsel, John A. Massalon, Esq., has consented to this extension.
4. No extension for this opposition has previously been requested or granted.

Wherefore Respondent prays that this Court grant a fifteen-day extension, to and including Monday, January 16, 2023, for filing its Opposition to the Petition for a Writ of Certiorari.

Date: December 28, 2022

Respectfully submitted,



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