

**RECEIVED**

**Dec 29 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

J. Mark Hayes, II, Circuit Court Judge

---

Case No. 2022-CP-42-00454  
Appellate Case No. 2022-001210

---

Ed Medford, in his individual capacity, and on behalf of those similarly  
situated, ..... Respondents,

v.

Deepak Israni, R Cucamonga, LLC, PAC R Cucamonga LP, Pacifica Skylyn, LLC, d/b/a  
Pacifica Senior Living Skylyn, Etros, LLC, and Matthew Arledge, ..... Appellants.

---

MOTION FOR SECOND EXTENSION OF TIME

---

Appellants respectfully moves this Court for an Order pursuant to Rule 263(b), SCACR  
for a thirty (30) day extension of time in which to file and serve its Initial Brief and Designation  
of Matters to be Included in the Record on Appeal, which is presently due on January 3, 2023.  
Time has not yet expired for Appellants to file and serve their Initial Brief and Designation of  
Matters. This motion is not made for the purpose of undue delay, and is the second request for  
an extension of time.

Counsel seeks additional time for drafting the initial brief due to workloads in other  
matters scheduled immediately after the New Year, and travel during the holidays. With the  
requested extension, Appellants' Initial Brief and Designation of Matters would be due February  
2, 2023.

December 29, 2022

*s/Paul E. Allen, Jr.*

Jonathan G. Roquemore (SC Bar No. 68274)

Joshua D. Shaw (SC Bar No. 77835)

Paul E. Allen, Jr. (SC Bar No.: 104062)

Hedrick Gardner Kincheloe & Garofalo LLP

1230 Main Street, Suite 325

Columbia, SC 29201

*Attorneys for Appellants*

**Other Counsel of Record:**

Patrick E. Knie

Knie & Shealy Attorneys at Law

250 Magnolia Street

Spartanburg, SC 29306

[pknie@knielaw.com](mailto:pknie@knielaw.com)

Mitch Slade

Mitch Slade Law Office, P.A.

PO Box 1007

Spartanburg, SC 29304

[mitch@mitchsladelaw.com](mailto:mitch@mitchsladelaw.com)

*Attorneys for Respondents*

**RECEIVED**

**Dec 29 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

J. Mark Hayes, II, Circuit Court Judge

---

Case No. 2022-CP-42-00454  
Appellate Case No. 2022-001210

---

Ed Medford, in his individual capacity, and on behalf of those similarly situated, ..... Respondents,

v.

Deepak Israni, R Cucamonga, LLC, PAC R Cucamonga LP, Pacifica Skylyn, LLC, d/b/a Pacifica Senior Living Skylyn, Etros, LLC, and Matthew Arledge, ..... Appellants.

---

CERTIFICATE OF SERVICE

---

It is hereby certified that the foregoing Motion for Extension of Time in the above-captioned case has been served on the following parties via e-mail, on December 29, 2022, pursuant to the South Carolina Supreme Court Order No. 2020-000447, as amended on May 5, 2022:

Patrick E. Knie  
Knie & Shealy Attorneys at Law  
250 Magnolia Street  
Spartanburg, SC 29306  
[pknie@knielaw.com](mailto:pknie@knielaw.com)

Mitch Slade  
Mitch Slade Law Office, P.A.  
PO Box 1007  
Spartanburg, SC 29304  
[mitch@mitchsladelaw.com](mailto:mitch@mitchsladelaw.com)  
*Attorneys for Respondents*

*s/Paul E. Allen Jr.*  
Paul E. Allen, Jr.

December 29, 2022

RECEIVED

Dec 29 2022

SC Court of Appeals



Charlotte • Raleigh • Wilmington • Columbia • Asheville

December 29, 2022

**Via e-mail**

South Carolina Court of Appeals  
Honorable Jenny Kitchings  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)  
1220 Senate Street  
Columbia, SC 29201

**Reply To:**

Paul E. Allen, Jr.  
1230 Main Street, Suite 325  
Columbia, SC 29201  
Direct: 803-274-3102  
Fax: 803-727-1259  
Email: [pallen@hedrickgardner.com](mailto:pallen@hedrickgardner.com)

**RE: Ed Medford, in his individual capacity, and on behalf of those similarly situated v. Pacifica Skylyn LLC, d/b/a Pacifica Senior Living Skylyn, et al.**  
**Civil Action No.: 2022-CP-42-00454**  
**Appellate Case No.: 2022-001210**

Dear Ms. Kitchings:

Enclosed for filing is Appellants' Motion for Second Extension of Time to Serve and File Initial Brief and Designation of Matters. Also enclosed for filing is a Proof of Service.

The \$50.00 filing fee will be submitted under separate cover within five (5) days of the filing of the Motion.

Very truly yours,

*s/ Paul E. Allen, Jr.*

Paul E. Allen, Jr.

PEA/pea

Cc: All Counsel of Record (via e-mail)

Enclosure(s)