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Mar 15 2023

SC Court of Appeals

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

Appeal from Colleton County
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

Case No. 2021-CP-15-00657
Appellate Case No. 2022-001242

Jennifer Rahn,
as Personal Representative of the Estate of Robert Ramsey,

Respondent,

v.

Priority Home Care, LLC, and
St. George Health Care, LLC, d/b/a St. George Healthcare Center,

Defendants,

Of which St. George Health Care, LLC, d/b/a St. George
Healthcare Center is

Appellant.

**SECOND MOTION FOR EXTENSION OF TIME
TO FILE/SERVE INITIAL BRIEF**

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
James D. Gandy, III (SC Bar No. 11925)
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Attorneys for Appellant

COMES NOW Appellant St. George Health Care, LLC, d/b/a St. George Healthcare Center, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for a second extension of thirty (30) days' additional time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed February 16, 2023, the deadline for Appellant's initial brief and designation of matter is March 16, 2023. On account of work-related and other time commitments, Appellant respectfully requests this deadline be extended by 30 days. Respectfully, Appellant believes this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellant moves this Honorable Court to grant it an additional extension of 30 days' time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving its initial brief and designation of matter would be April 17, 2023,¹ according to the undersigned's calculations. Further, Appellant respectfully requests the Court hold its present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

¹ Calculating the 30-day period (from March 16, 2023) in accordance with Rule 263(a), SCACR, it runs until April 17, 2023, because the 30th day is Saturday, April 15, 2023.

*[signature page for Second Motion for Extension of Time
to File/Serve Initial Brief, Appeal no. 2022-001242]*

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
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PROOF OF SERVICE

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
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Attorneys for Appellant

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, hereby certify that Appellant's **SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF** was served on Respondent and on Defendant Priority Home Care, LLC, on March 15, 2023, by emailing (see attached) a copy of the same to their following counsel of record:

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Respectfully submitted,
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Attorneys for Appellant

Charleston, South Carolina

March 15, 2023

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Wednesday, March 15, 2023 4:15 PM
To: 'lcope@parkerlawgroupsc.com'; 'jayparker@parkerlawgroupsc.com';
'ccartier@parkerlawgroupsc.com'; 'sharvin@lowcountry.com'; 'mdc@barnwell-
whaley.com'; 'sclarke@barnwell-whaley.com'
Cc: Hines, Russell; Justman, Aimee
Subject: Rahn v. St. George Healthcare, LLC // Appellate Case No. 2022-001242 (CR 210888)
Attachments: 2nd Motion for Extension - initial brief.pdf

Enclosed please find Appellant's Second Motion for Extension of Time to File/Serve their Initial Brief which will be filed today in the above-referenced matter.

Thank you,

Pollyana Bell
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