

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM HAMPTON COUNTY  
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge

Case No. 2010-CP-25-489 and 490

Linda Johnson, as Personal Representative of the Estate of  
Inez Roberts.....Respondent,

v.

Heritage Healthcare of Estill, LLC, d/b/a Heritage of the Lowcountry  
and/or Uni-Health Post Acute Care of the Lowcountry, United Clinical  
Services, Inc., United Rehab, Inc., and UHS Pruitt Corporation .....Appellants.

**MOTION FOR EXTENSION OF TIME**

Linda Johnson, as Personal Representative of the Estate of Inez Roberts, by and through her undersigned counsel, hereby moves for an extension of time within which to file her Initial Brief and Designation of Matter to be included in the Record on Appeal. Respondent respectfully requests an extension of five (5) days to file these documents.

The current due date for Respondent's Initial Brief and Designation is June 17, 2013. The grounds for the Respondent's request are that due to counsel's schedule – which includes another appellate brief in a related matter being due today, as well as another due last Friday, June 15, 2013 – has not allowed counsel adequate preparation time to complete these matters. The undersigned has obtained consent to this motion from opposing counsel, Montieth Todd, Esquire.

**RECEIVED**  
JUN 20 2013

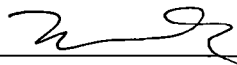
**SC Court of Appeals**

Counsel for the Respondent therefore requests that the Initial Brief and Designation of Matter to be Included on the Record on Appeal be due for service on Friday, June 25, 2013.

Respectfully submitted,

**PETERS, MURDAUGH, PARKER,  
ELTZROTH & DETRICK, P.A.**

BY: \_\_\_\_\_

  
LEE D. COPE, ESQUIRE  
MATTHEW V. CREECH, ESQUIRE  
101 Mulberry Street East  
Post Office Box 457  
Hampton, South Carolina 29924  
(803) 943-2111

AND

Charles J. McCutchen  
Lanier & Burroughs, LLC  
Post Office Drawer 2789  
Orangeburg, SC 29116

ATTORNEYS FOR PLAINTIFFS

Ridgeland, South Carolina  
June 17, 2013

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM HAMPTON COUNTY  
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge

Case No. 2010-CP-25-489 and 490

Lind Johnson, as Personal Representative of the Estate of  
Inez Roberts.....Respondent,

v.

Heritage Healthcare of Estill, LLC, d/b/a Heritage of the Lowcountry  
and/or Uni-Health Post Acute Care of the Lowcountry, United Clinical  
Services, Inc., United Rehab, Inc., and UHS Pruitt Corporation .....Appellants.

**CERTIFICATE OF SERVICE**

I, the undersigned, of the law offices of Peters, Murdaugh, Parker, Eltzroth & Detrick, attorneys for the Respondents, do hereby certify that I have served all counsel in this action with a copy of the Motion for Extension of Time to File Initial Brief and Designation of Matter to be included in the Record on Appeal by mailing a copy of the same to counsel via United States Mail, postage prepaid, at the following address(es):

Sowell, Gray, Stepp, & Laffitte, LLC  
Monteith P. Todd, Esquire  
J. Michael Montgomery, Esquire  
PO Box 11449  
Columbia, SC 29211

Tyler Arnold, Esquire  
Jason Bring, Esquire  
Jerad Rissler, Esquire  
Arnall Golden Gregory, LLP  
171 17<sup>th</sup> Street NW, Suite 2100  
Atlanta, GA 30363-1031

**RECEIVED**  
JUN 20 2013

**SC Court of Appeals**

  
Matthew V. Creech

June 17, 2013