

**RECEIVED**  
**May 11 2023**  
**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 EXTENSION OF TIME

---

Appellants respectfully moves this Court for an Order pursuant to Rule 263(b), SCACR for a ten (10) day extension of time in which to file and serve its Initial Reply Brief, which is presently due on May 12, 2023. Time has not yet expired for Appellants to file and serve their Initial Reply Brief. This motion is not made for the purpose of undue delay, and is the first request for an extension of time concerning the Initial Reply Brief.

Counsel seeks additional time for drafting the initial reply brief due to workloads in other matters. With the requested extension, Appellants' Initial Reply Brief would be due May 22, 2023.

*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*

May 11, 2023

**RECEIVED**

**May 11 2023**

**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 May 11, 2023, 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.

May 11, 2023



RECEIVED

May 11 2023

SC Court of Appeals

Charlotte • Raleigh • Wilmington • Columbia • Asheville

May 11, 2023

**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 Extension of Time to Serve and File an Initial Reply Brief in the above-referenced matter. 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)