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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Dorchester County
Court of Common Pleas

Robert Bonds, Circuit Court Judge
R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2021-CP-18-01030
Appellate Case No. 2022-001807

Tammy China,
as Personal Representative of the
Estate of Emma Lee James,

Respondent,

v.

Palmetto Hallmark Operating, LLC
d/b/a Hallmark Healthcare Center, and
Elite Patient Care of South Carolina, PC,

Defendants,

Of which Palmetto Hallmark Operating, LLC
d/b/a Hallmark Healthcare Center is

Appellant.

MOTION FOR EXTENSION OF TIME
TO FILE/SERVE INITIAL BRIEF OF RESPONDENT

STROM LAW FIRM, LLC

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Amy E. Willbanks (S.C. Bar # 69331)
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COMES NOW Respondent, Tammy China as Personal Representative of the Estate of Emma Lee James, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of thirty (30) days' time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal.

Presently the deadline for Respondent's initial brief and designation of matter is June 12, 2023. Because of work-related and other time commitments, Respondent respectfully requests this deadline be extended by 30 days. Respectfully, Respondent believes this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Respondent 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 July 12, 2023, 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.

Respectfully submitted,

s/Mario A. Pacella

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Attorneys for Respondent

Columbia, South Carolina

June 1, 2023

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Tammy China
as Personal Representative of the
Estate of Emma Lee James, Respondent,

v.

Palmetto Hallmark Operating, LLC
d/b/a Hallmark Healthcare Center, and
Elite Patient Care of South Carolina, PC, Defendants,

Of which Palmetto Hallmark Operating, LLC
d/b/a Hallmark Healthcare Center is Appellant

PROOF OF SERVICE

The undersigned hereby certifies that on June 1, 2023, she served the Respondent's Motion for an Extension to File/Serve Initial Brief of Respondent in this matter on Appellant, by emailing a copy of the same to Appellant's attorneys of record, Stephen L. Brown, D. Jay Davis, Jr., Matthew O. Riddle, Kara S. Grevey, and Russell G. Hines, at sbrown@ycrlaw.com, jdavis@ycrlaw.com, mriddle@ycrlaw.com, kgrevey@ycrlaw.com, and rhines@ycrlaw.com respectively.

Respectfully submitted,

June 1, 2023
Columbia, SC

Faith Grant
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