

**RECEIVED**

**Jul 24 2023**

**SC Court of Appeals**

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

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Appeal from Dorchester County  
Court of Common Pleas

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

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

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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.

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

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CLEMENT RIVERS, LLP  
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D. Jay Davis, Jr. (SC Bar No. 12084)  
Matthew O. Riddle (SC Bar No. 76650)  
Kara S. Grevey (SC Bar No. 101742)  
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(843) 720-5488  
*Attorneys for Appellant*

COMES NOW Appellant Palmetto Hallmark Operating, LLC d/b/a Hallmark Healthcare Center, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of ten (10) days' time to file/serve its initial reply brief.

Presently, in accordance with Rule 208(a)(3), the deadline for Appellant's initial reply brief is today, July 24, 2023. Because of work-related and other time commitments, Appellant respectfully requests this deadline be extended by 10 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 extension of 10 days' time to file/serve its initial reply brief. With the extension requested herein, the new deadline for filing/serving its initial reply brief would be August 3, 2023, according to the undersigned's calculations. Further, Appellant respectfully requests the Court hold its present briefing deadline in abeyance until it acts upon this motion.

*[signature on next page]*

*[Signature page for Motion for Extension of Time to File/Serve Initial Reply Brief  
of Appellant, Appellate Case No. 2022-001807]*

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Stephen L. Brown (SC Bar No. 66468)  
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Charleston, South Carolina

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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.

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**PROOF OF SERVICE**

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CLEMENT RIVERS, LLP  
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D. Jay Davis, Jr. (SC Bar No. 12084)  
Matthew O. Riddle (SC Bar No. 76650)  
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*Attorneys for Appellant*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, hereby certify that the **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANT** was served on Respondent and Defendant Elite Patient Care of South Carolina, PC, on July 24, 2023, by emailing (see attached email) a copy of the same to their counsel of record:

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Respectfully submitted,  
CLEMENT RIVERS, LLP

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Russell G. Hines (SC Bar No. 72100)  
*Attorneys for Appellant*

Charleston, South Carolina

July 24, 2023

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Monday, July 24, 2023 1:32 PM  
**To:** Mario Pacella; Jessica Fickling; Amy Willbanks; Joseph Tierney, Jr; Hunter A. Morgan  
**Cc:** Hines, Russell; Justman, Aimee  
**Subject:** China v. Palmetto Hallmark; Appellate Case No. 2022-001807 (CR 200829)  
**Attachments:** 1st Motion for Extension - initial reply brief.pdf

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

Thank you,

Pollyana Bell  
Project Assistant  
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