

**RECEIVED**

**Jul 27 2023**

**SC Court of Appeals**

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

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Appeal from Colleton County  
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

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

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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.

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

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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)  
Russell G. Hines (SC Bar No. 72100)  
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Charleston, South Carolina 29401  
(843) 720-5488

*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 an extension of ten (10) days' additional 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 27, 2023. On account 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 additional 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 7, 2023, according to the undersigned's calculations. Further, Appellant respectfully requests the Court hold its present initial-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, Appeal no. 2022-001242]*

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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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)  
James D. Gandy, III (SC Bar No. 11925)  
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*Attorneys for Appellant*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, hereby certify that Appellant's **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF** was served on Respondent and on Defendant Priority Home Care, LLC, on July 27, 2023, by emailing (see attached) a copy of the same to their following counsel of record:

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*-and-*

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*Attorneys for Respondent  
Jennifer Rahn, as Personal Representative  
of the Estate of Robert Ramsey*

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*Attorneys for Defendant  
Priority Home Care, LLC*

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Russell G. Hines (SC Bar No. 72100)

*Attorneys for Appellant*

Charleston, South Carolina

July 27, 2023

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Thursday, July 27, 2023 2:00 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:** 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  
Commercial Litigation Practice Group  
Phone:(843)720-5488 | Fax:(843)579-1369



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