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SC Court of Appeals

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

Appeal from Colleton County
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

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

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.

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

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

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 a second extension of ten (10) days' additional time to file/serve its initial reply brief.

Presently, by order of this Court filed July 28, 2023, the deadline for Appellant's initial reply brief is today, August 7, 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 17, 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 Second 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
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PROOF OF SERVICE

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Attorneys for Appellant

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, hereby certify that Appellant's **SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF** was served on Respondent and on Defendant Priority Home Care, LLC, on August 7, 2023, by emailing (see attached) a copy of the same to their following counsel of record:

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Respectfully submitted,
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Attorneys for Appellant

Charleston, South Carolina

August 7, 2023

Bell, Pollyana (Polly)

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Sent: Monday, August 7, 2023 1:31 PM
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Cc: Hines, Russell; Justman, Aimee
Subject: Rahn v. St. George Healthcare, LLC // Appellate Case No. 2022-001242 (CR 210888)
Attachments: 2nd Motion for Extension - initial reply brief.pdf

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

Thank you,

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