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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.

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

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
Matthew O. Riddle (SC Bar No. 76650)
Kara S. Grevey (SC Bar No. 101742)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(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 a second extension of ten (10) days' 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 3, 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 14, 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 Second 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)
D. Jay Davis, Jr. (SC Bar No. 12084)
Matthew O. Riddle (SC Bar No. 76650)
Kara S. Grevey (SC Bar No. 101742)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488
Attorneys for Appellant

Charleston, South Carolina

August 3, 2023

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PROOF OF SERVICE

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
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Kara S. Grevey (SC Bar No. 101742)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Appellant

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, hereby certify that the **SECOND 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 August 3, 2023, by emailing (see attached email) a copy of the same to their counsel of record:

Mario A. Pacella, Esquire
mpacella@stromlaw.com
Jessica L. Fickling, Esquire
jfickling@stromlaw.com
Amy E. Willbanks, Esquire
awillbanks@stromlaw.com
STROM LAW FIRM, LLC
Attorneys for Respondent

Joseph J. Tierney, Jr., Esquire
joseph.tierney@rogerstownsends.com
Hunter A. Morgan, Esquire
hunter.morgan@rogerstownsends.com
ROGERS TOWNSEND, LLC
*Attorneys for Defendant
Elite Patient Care of South Carolina, PC*

Respectfully submitted,
CLEMENT RIVERS, LLP

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

Charleston, South Carolina

August 3, 2023

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Thursday, August 3, 2023 2:17 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: 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,

Pollyana Bell
Project Assistant
Commercial Litigation Practice Group
Phone:(843)720-5488 | Fax:(843)579-1369



CLEMENT RIVERS, LLP
25 Calhoun Street • Suite 600 • Charleston, SC 29401
FOR GREAT