

**RECEIVED**

**Aug 18 2023**

**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.

---

**MOTION TO ACCEPT INITIAL REPLY BRIEF OF APPELLANT**

---

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)  
25 Calhoun Street, Suite 400  
P.O. Box 993 (29402)  
Charleston, South Carolina 29401  
(843) 720-5488

*Attorneys for Appellant*

NOW COMES 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, on the grounds set forth below, hereby moves this Honorable Court to accept the Initial Reply Brief of Appellant, which, as explained below, was served on August 17, 2023, and is being conditionally filed contemporaneously herewith.

By order filed August 8, 2023, the Court extended the deadline for Appellant to serve and file the Initial Reply Brief of Appellant to August 17, 2023. As shown on the attached **Exhibit 1**, Appellant's counsel served the Initial Reply Brief of Appellant on all parties to this appeal via email on August 17, 2023, at 11:59:32 PM. Appellant's counsel, however, was not able to file the Initial Reply Brief of Appellant and Proof of Service via email before the date changed to August 18, 2023.

WHEREFORE, with apologies to the Court and counsel, Appellant's counsel respectfully submits that there is good cause for the Court to accept the Initial Reply Brief of Appellant (which is being conditionally filed contemporaneously herewith) as duly served and filed, because the grant of such relief is in the interests of justice and will not result in any undue prejudice or delay.

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)  
James D. Gandy, III (SC Bar No. 11925)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
P.O. Box 993 (29402)  
Charleston, South Carolina 29401  
(843) 720-5488  
*Attorneys for Appellant*

Charleston, South Carolina

August 18, 2023

**From:** [Hines, Russell](#)  
**To:** "[Lee Cope](#)"; "[Jay Parker](#)"; "[sharvin@lowcountry.com](#)"; "[mdc@barnwell-whaley.com](#)"; "[Summers Clarke](#)"  
**Cc:** [Davis, Jay](#); [Brown, Stephen L.](#); [Gandy, III, James D. \(Tripp\)](#); [Phillips, Ashton](#); [Dotterer III, Gaillard T. \(Gilly\)](#); [Wakeham, Rebecca \(Becky\)](#); [Peterson, Susan](#); [Justman, Aimee](#); [Bell, Pollyana \(Polly\)](#)  
**Subject:** Rahn v. Priority Home Care (St. George Health Care) -- Appellate Case No. 2022-001242 -- Initial Reply Brief of Appellant  
**Date:** Thursday, August 17, 2023 11:59:32 PM  
**Attachments:** [image001.png](#)  
[Rahn v. Priority Home Care \(2022-001242\) -- Initial Reply Brief of Appellant.pdf](#)  
[Rahn v. Priority \(St. George\) -- POS for Initial Reply Brief of Appellant.pdf](#)

---

Attached regarding the above-referenced matter, please find the **Initial Reply Brief of Appellant**.

Russell G. Hines  
CLEMENT RIVERS, LLP  
[www.ycrlaw.com](http://www.ycrlaw.com)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
Phone: (843) 720-5488  
Fax: (843) 579-1327  
Email: [rhines@ycrlaw.com](mailto:rhines@ycrlaw.com)



**CLEMENT RIVERS, LLP**  
25 Calhoun Street • Suite 400 • Charleston, SC 29401  
[ycrlaw.com](http://ycrlaw.com)

**RECEIVED**

**Aug 18 2023**

**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.

---

**PROOF OF SERVICE**

---

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)  
25 Calhoun Street, Suite 400  
P.O. Box 993 (29402)  
Charleston, South Carolina 29401  
(843) 720-5488

*Attorneys for Appellant*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, hereby certify that Appellant's **MOTION TO ACCEPT INITIAL REPLY BRIEF OF APPELLANT** was served on Respondent and on Defendant Priority Home Care, LLC, on August 18, 2023, by emailing (see attached) a copy of the same to their following counsel of record:

PARKER LAW GROUP, LLP  
Lee D. Cope, Esquire  
[lcope@parkerlawgroupsc.com](mailto:lcope@parkerlawgroupsc.com)  
John E. Parker, Jr., Esquire  
[jayparker@parkerlawgroupsc.com](mailto:jayparker@parkerlawgroupsc.com)

*-and-*

HETRICK, HARVIN & BONDS, LLC  
L. Scott Harvin, Esquire  
[sharvin@lowcountry.com](mailto:sharvin@lowcountry.com)

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

BARNWELL WHALEY PATTERSON & HELMS, LLC  
M. Dawes Cooke, Jr., Esquire  
[mdc@barnwell-whaley.com](mailto:mdc@barnwell-whaley.com)  
D. Summers Clarke, II, Esquire  
[sclarke@barnwell-whaley.com](mailto:sclarke@barnwell-whaley.com)

*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

August 18, 2023

**From:** [Hines, Russell](#)  
**To:** "[Lee Cope](#)"; "[Jay Parker](#)"; "[sharvin@lowcountry.com](#)"; "[mdc@barnwell-whaley.com](#)"; "[Summers Clarke](#)"  
**Cc:** [Davis, Jay](#); [Brown, Stephen L.](#); [Gandy, III, James D. \(Tripp\)](#); [Phillips, Ashton](#); [Dotterer III, Gaillard T. \(Gilly\)](#); [Wakeham, Rebecca \(Becky\)](#); [Peterson, Susan](#); [Justman, Aimee](#); [Bell, Pollyana \(Polly\)](#)  
**Subject:** Rahn v. Priority Home Care (St. George Health Care) -- Appellate Case No. 2022-001242 -- Motion to Accept Initial Reply Brief of Appellant  
**Date:** Friday, August 18, 2023 12:51:51 AM  
**Attachments:** [image001.png](#)  
[Rahn v. Priority \(St. George\) -- Motion to Accept Initial Reply Brief of Appellant.pdf](#)

---

Attached regarding the above-referenced matter, please find Appellant's **Motion to Accept Initial Reply Brief of Appellant**.

Russell G. Hines  
CLEMENT RIVERS, LLP  
[www.ycrlaw.com](http://www.ycrlaw.com)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
Phone: (843) 720-5488  
Fax: (843) 579-1327  
Email: [rhines@ycrlaw.com](mailto:rhines@ycrlaw.com)



**CLEMENT RIVERS, LLP**

25 Calhoun Street • Suite 400 • Charleston, SC 29401  
[ycrlaw.com](http://ycrlaw.com)