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SC Court of Appeals

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

Appeal from Pickens County
Court of Common Pleas

G.D. Morgan, Jr., Circuit Court Judge

Cases No. 2021-CP-39-01127 and -01128
Appellate Case No. 2023-000033

Deonda Weldon, Individually and as
Personal Representative of the Estate of Earline Cooley, Appellant,

v.

Dominion Clemson, LLC d/b/a Dominion Senior Living at
Patrick Square; Dominion Senior Living, LLC; Dominion
Clemson, II, LLC; Dominion Management Group, LLC; and
Dominion Group, LLC, Respondents.

**CONSENT MOTION FOR ONE-WEEK EXTENSION OF TIME
TO FILE/SERVE INITIAL BRIEF OF RESPONDENTS**

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-and-

Joshua T. Thompson (SC Bar No. 79137)
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Attorneys for Respondents

NOW COME Respondents, Dominion Clemson, LLC d/b/a Dominion Senior Living at Patrick Square; Dominion Senior Living, LLC; Dominion Clemson, II, LLC; Dominion Management Group, LLC; and Dominion Group, LLC, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and, on the grounds set forth below, move—**with the consent of counsel for Appellant**—for an extension of one (1) week’s additional time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal.

By order filed August 8, 2023, the Court extended the time for filing/serving Respondents’ initial brief and designation of matter to today, September 1, 2023. Because of work-related and other time commitments, including an unexpected disruption to work caused by Hurricane Idalia, the undersigned respectfully requests that Respondents’ deadline to file/serve their initial brief and designation of matter be extended by one (1) week, i.e., from Friday, September 1, 2023, to Friday, September 8, 2023. Having communicated with opposing counsel prior to making this motion and obtained their courteous consent to the relief requested herein, the undersigned respectfully asks the Court to consider the circumstances that occasion the instant motion sufficient to warrant such relief, which, it is submitted, is timely sought, reasonable in scope, consistent with the interests of justice, and not prejudicial to Appellant.

WHEREFORE, Respondents move this Honorable Court to extend the

deadline for them to file/serve their initial brief and designation of matter to September 8, 2023. Further, Respondents respectfully request that the Court hold their present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

Respectfully submitted,

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Attorneys for Respondents

Charleston, South Carolina

September 1, 2023

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v.

Dominion Clemson, LLC d/b/a Dominion Senior Living at
Patrick Square; Dominion Senior Living, LLC; Dominion
Clemson, II, LLC; Dominion Management Group, LLC; and
Dominion Group, LLC, Respondents.

PROOF OF SERVICE

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Attorneys for Respondents

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Respondents, hereby certify that **CONSENT MOTION FOR ONE-WEEK EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF RESPONDENTS** was served on all other parties to this matter on September 1, 2023, by emailing (see attached email) a copy of the same to their counsel of record:

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Attorneys for Appellants

Respectfully submitted,

By: s/Russell G. Hines
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Attorneys for Respondents

Charleston, South Carolina

September 1, 2023

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Friday, September 1, 2023 12:06 PM
To: 'mchristian@cclawfirm.com'; 'jcalloway@mcgowanhood.com';
'jthompson@btblawfirm.com'; 'pboulier@btblawfirm.com'; 'aylaluers@gmail.com';
'jbynum@btblawfirm.com'; 'eboles@btblawfirm.com'
Cc: Hines, Russell; Justman, Aimee
Subject: Weldon v. Dominion Clemson, LLC; 2023-000033 (CR 230229)
Attachments: 3rd Motion for Extension - Initial Brief of Respondents.pdf

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

Thank you,

Pollyana Bell
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