

IN 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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Appellate Case No. 2023-001282

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Gabrielle Washington as Personal Representative of the Estate of Walter Washington, Jr. ....Respondent,

-v-

St. George Health Care, LLC, d/b/a St. George Health Care Center and Walterboro Community Hospital, Inc., d/b/a Colleton Medical Center.....Defendants,

Of which St. George Health Care, LLC, d/b/a St. George Healthcare Center is.....Appellant.

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**RESPONDENT’S CONSENT MOTION FOR EXTENSION OF TIME TO FILE  
AND SERVE HER INITIAL BRIEF AND DESIGNATION OF MATTER FOR  
INCLUSION IN THE RECORD ON APPEAL**

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Respondent Gabrielle Washington as Personal Representative of the Estate of Walter Washington, Jr., pursuant to Rule 263 of the South Carolina Appellate Court Rules, respectfully request a thirty (30) day extension of time to file and serve her Initial Brief and Designation of Matter for inclusion in the Record on Appeal. This request is necessary due to the undersigned counsel’s numerous other work conflicts and scheduling deadlines.

The undersigned counsel for Respondent has consulted with counsel for Appellant and he consents to this motion.

Respectfully submitted,

PARKER LAW GROUP, LLP

By: \_\_\_\_\_



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**Attorneys for Respondent**

November 28, 2023  
Hampton, South Carolina

**RECEIVED**

**Nov 28 2023**

**SC Court of Appeals**

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Walterboro Community Hospital, Inc., d/b/a Colleton Medical Center.....Defendants,

Of which St. George Health Care, LLC, b/b/a St. George Healthcare  
Center is .....Appellant.

**PROOF OF SERVICE**

The undersigned certifies that a copy of the foregoing Motion for Extension of  
Time to file Respondent’s Initial Brief and Designation of Matter has been served  
upon the following counsel of record by emailing a copy of the same, this 28<sup>th</sup> day of  
November 2023.

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**Attorneys for Defendant Walterboro  
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By: \_\_\_\_\_



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**Attorneys for Respondent**

November 28, 2023

**Via Email Only: ctappfilings@sccourts.org**

The Honorable Jenny Abbott Kitchings  
S.C. Court of Appeals Clerk of Court  
Post Office Box 11629  
Columbia, SC 29211-1629

***Re: Gabrielle Washington as Personal Representative of the Estate of  
Walter Washington, Jr. v St. George Health Care, LLC, d/b/a St.  
George Health Care Center  
Appellate Case No. 2023-001282***

Dear Ms. Kitchings:

Please find enclosed for filing Respondent's Motion for Extension of Time to file Respondent's Initial Brief and Designation of Matter and Proof of Service in regard to the above referenced matter. In addition, our firm's check in the amount of \$50.00 will go out in today's mail for the filing fee.

By copy of this letter, Respondent's Motion is being served on all counsel of record.

With kind regards, I am

Sincerely,



John E. Parker Jr.

JEP/cc

Enclosures as stated.