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Jan 11 2024

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 PETITION FOR REHEARING**

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 an extension of fifteen (15) days' additional time to file/serve a petition for rehearing of this matter, which the Court decided via opinion filed December 13, 2023. *See Rahn v. Priority Home Care, LLC*, Unpublished Op. No. 2023-UP-397.

Presently, by order of this Court filed December 29, 2023, the deadline to petition for rehearing is January 12, 2024. Because of work-related and other time commitments, the undersigned counsel for Appellant requests the Court's allowance of fifteen (15) days' additional time to petition for rehearing. Respectfully, the undersigned submits there is good cause for the Court to grant the relief requested herein, as it is, under the circumstances, a reasonable dispensation, timely sought, consistent with the interests of justice, posing no threat of undue prejudice to any other party.

WHEREFORE, Appellant requests the Court grant an extension of 15 days' time to petition for rehearing. By the undersigned's calculations, the grant of this relief would make the new deadline to petition for rehearing January 29, 2024. ADDITIONALLY, for the same reasons set forth in support of the within request for an extension of time, Appellant requests the Court hold the present deadline for petitioning for rehearing in abeyance until the Court acts on this motion.

*[signature page for Second Motion for Extension of Time to Petition for Rehearing,
Appeal no. 2022-001242]*

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
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Attorneys for Appellant

Charleston, South Carolina

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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 PETITION FOR REHEARING** was served on Respondent and on Defendant Priority Home Care, LLC, on January 11, 2024, 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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Charleston, South Carolina

January 11, 2024

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Thursday, January 11, 2024 10:44 AM
To: 'lcope@parkerlawgroupsc.com'; 'jayparker@parkerlawgroupsc.com'; 'sharvin@lowcountry.com'; 'mdc@barnwell-whaley.com'; 'sclarke@barnwell-whaley.com'
Cc: Hines, Russell; Justman, Aimee
Subject: Rahn v. Priority Home Care; Appellate Case No. 2022-001242 (CR 210888)
Attachments: 2nd Motion for Extension - petition for rehearing.pdf

Enclosed please find Appellant's Second Motion for Extension of Time to Petition for Rehearing for service upon you in the above-referenced matter.

Thank you,

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