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**Feb 01 2024**

**SC Court of Appeals**

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

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Appeal from Florence County  
Court of Common Pleas

William H. Seals Jr., Circuit Court Judge

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Case No. 2020-CP-21-02290

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Mary Tisdale  
as Personal Representative of the Estate of Earlene Seabrook,

Respondent,

v.

Palmetto Lake City Operating, LLC  
d/b/a Lake City-Scranton Healthcare Center  
and Jeffrey Gibbs,

Defendants,

Of whom Palmetto Lake City Operating, LLC  
d/b/a Lake City-Scranton Healthcare Center is

Appellant.

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**SECOND MOTION FOR EXTENSION OF  
TIME TO PETITION FOR REHEARING**

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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)  
Russell G. Hines (SC Bar No. 72100)  
Gaillard T. Dotterer, III (SC Bar No. 103620)  
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P.O. Box 993 (29402)  
(843) 720-5488  
*Attorneys for Appellant*

NOW COMES Appellant, Palmetto Lake City Operating, LLC d/b/a Lake City-Scranton 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 January 3, 2024. *See Tisdale v. Palmetto Lake City Operating, LLC*, Unpublished Op. No. 2024-UP-005.

By order of this Court filed January 18, 2024, the present deadline to petition for rehearing is February 2, 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 that the Court grant it 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 February 20, 2024.<sup>1</sup> ADDITIONALLY, for the same reasons set forth in support of the within

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<sup>1</sup> Calculating the 15-day period in accordance with Rule 263(a), SCACR, it runs until Tuesday, February 20, 2024, because the 17<sup>th</sup> and 18<sup>th</sup> of February are the weekend and the 19<sup>th</sup> of February is a federal holiday.

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.

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Stephen L. Brown (SC Bar No. 66468)  
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Matthew O. Riddle (SC Bar No. 76650)  
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Charleston, South Carolina

February 1, 2024

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Appellant.

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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 the **MOTION FOR EXTENSION OF TIME TO PETITION FOR REHEARING** was served on Respondent, Mary Tisdale, as Personal Representative of the Estate of Earlene Seabrook, on February 1, 2024, by emailing (see attached) a copy of the same to Respondent's counsel of record:

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*-and-*

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*Attorneys for Respondent*

Respectfully submitted,  
CLEMENT RIVERS, LLP

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

*Attorneys for Appellant*

Charleston, South Carolina

February 1, 2024

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Thursday, February 1, 2024 12:09 PM  
**To:** 'nate@hugheyfirm.com'; 'stuart@hugheyfirm.com'; 'brad@hugheyfirm.com';  
jcalloway@mcgowanhood.com  
**Cc:** Hines, Russell; Justman, Aimee  
**Subject:** Tisdale v. Palmetto Lake City; Appellate Case No. 2021-000586 (CR 200486)  
**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,

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



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