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Feb 01 2024

SC Court of Appeals

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

Appeal from Marion County
Court of Common Pleas

H. Steven DeBerry IV, Circuit Court Judge

Case No. 2022-CP-33-00183

Rebecca C. Hagood
as Personal Representative of the Estate of Frank D. Chavis, Sr.,

Respondent,

v.

Palmetto Faith Operating, LLC
d/b/a Faith Healthcare Center and
Brooks Arnette,

Appellants.

**MOTION FOR EXTENSION OF TIME
TO FILE/SERVE INITIAL BRIEF OF APPELLANTS**

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)
Kara S. Grevey (SC Bar No. 101742)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Appellants

NOW COME Appellants Palmetto Faith Operating, LLC d/b/a Faith Healthcare Center and Brooks Arnette, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an extension of thirty (30) days' additional time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal.

Pursuant to Rule 208(a), SCACR, the deadline for Appellants' initial brief and designation of matter is February 5, 2024. On account of work-related and other time commitments, Appellants respectfully request this deadline be extended by 30 days. Respectfully, Appellants believe this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellants move this Honorable Court to grant them an extension of 30 days' time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving their initial brief and designation of matter would be March 6, 2024, according to the undersigned's calculations. Further, Appellants respectfully request the Court hold the present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

<SIGNED ON THE FOLLOWING PAGE>

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)
Matthew O. Riddle (SC Bar No. 76650)
Kara S. Grevey (SC Bar No. 101742)
Russell G. Hines (SC Bar No. 72100)
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Attorneys for Appellants

Charleston, South Carolina

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PROOF OF SERVICE

CLEMENT RIVERS, LLP
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Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Appellants

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that the **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANTS** was served on Respondent on February 1, 2024, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

A. Keith McAlister Jr., Esquire
HAWK LAW GROUP
kmcalister@hawklawgroup.com

Attorney for Respondent

Respectfully submitted,
CLEMENT RIVERS, LLP

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

Attorneys for Appellants

Charleston, South Carolina

February 1, 2024

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Thursday, February 1, 2024 12:20 PM
To: 'Kip McAlister'
Cc: Hines, Russell; Justman, Aimee
Subject: Hagood v. Palmetto Faith Operating; Appellate Case No. 2023-001712 (CR 210731)
Attachments: 1st Motion for Extension - Initial Brief.pdf

Enclosed please find Appellants' Motion for Extension of Time to File/Serve their Initial Brief 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



CLEMENT RIVERS, LLP
25 Calhoun Street • Suite 600 • Charleston, SC 29401
www.clementrivers.com