

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

RECEIVED

Feb 16 2024

SC Court of Appeals

Appeal from Colleton County
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

Appellate Case No. 2023-001282
Circuit Court Case No. 2021-CP-15-00516

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

Respondent,

v.

St. George Health Care, LLC, d/b/a St. George Healthcare 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.

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

CLEMENT RIVERS, LLP

Stephen L. Brown (SC Bar No. 66468)

D. Jay Davis, Jr. (SC Bar No. 12084)

James D. Gandy, III (SC Bar No. 11925)

Gaillard T. Dotterer, III (SC Bar No. 103620)

Russell G. Hines (SC Bar No. 72100)

25 Calhoun Street, Suite 400

P.O. Box 993 (29402)

Charleston, South Carolina 29401

(843) 720-5488

Attorneys for Appellant

NOW COMES 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 ten (10) days' time to file/serve its initial reply brief.

Pursuant to Rule 208(a)(3), SCACR, the present deadline for Appellant's initial reply brief is today, Friday, February 16, 2024. On account of work-related and other time commitments, Appellant respectfully requests this deadline be extended by 10 days. Respectfully, Appellant believes this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellant moves this Honorable Court to grant it an additional extension of 10 days' time to file/serve its initial reply brief (and any corresponding designation of additional matter to be included in the record on appeal). With the extension requested herein, the new deadline for filing/serving Appellant's initial reply brief would be February 26, 2024, according to the undersigned's calculations. Further, Appellant respectfully requests the Court hold the present deadline in abeyance until it acts upon this motion.

[signature on next page]

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
James D. Gandy, III (SC Bar No. 11925)
Gaillard T. Dotterer, III (SC Bar No. 103620)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
P.O. Box 993 (29402)
Charleston, South Carolina 29401
(843) 720-5488
Attorneys for Appellant

Charleston, South Carolina

February 16, 2024