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Feb 23 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

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.

**SECOND 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)

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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.

Presently, by order of this Court filed February 21, 2024, the deadline for Appellant's initial reply brief is Monday, February 26, 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 March 7, 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
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D. Jay Davis, Jr. (SC Bar No. 12084)
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PROOF OF SERVICE

CLEMENT RIVERS, LLP

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Attorneys for Appellant

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, hereby certify that **SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANT** was served on Respondent and Defendant Walterboro Community Hospital, Inc. d/b/a Colleton Medical Center on February 23, 2024, via email (see attached) to their following counsel of record:

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-and-

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Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines
Attorneys for Appellant

Charleston, South Carolina

February 23, 2024

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Friday, February 23, 2024 1:29 PM
To: lcope@parkerlawgroupsc.com; jayparker@parkerlawgroupsc.com; weldon@basjlaw.com; emily@basjlaw.com; creasie@basjlaw.com; shane@landblawfirm.com
Cc: Hines, Russell; Justman, Aimee
Subject: Washington v. St. George Health Care; Appellate Case No. 2023-001282 (CR 210566)
Attachments: 2nd Motion for Extension - Initial Reply Brief.pdf

Enclosed please find Appellant's Second Motion for Extension of Time to File/Serve their Initial Reply Brief for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell
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