

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

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**RECEIVED**

**Mar 05 2024**

Appeal from Georgetown County  
Court of Common Pleas

**S.C. SUPREME COURT**

Benjamin H. Culbertson, Circuit Court Judge

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Case No. 2019-CP-22-00961

Unpublished Opinion No. 2023-UP-396, (S.C. Ct. App. filed Dec. 13, 2023)

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Kevin Greene,  
as Attorney in Fact for and on Behalf of  
Eleanor Greene Wragg,

Respondent,

v.

Palmetto Prince George Operating, LLC  
d/b/a Prince George Healthcare Center;  
Palmetto Health Care, LLC;  
Murray Forman, Individually; and  
Richard Porter, Individually,

Defendants.

Of whom Palmetto Prince George Operating, LLC  
d/b/a Prince George Healthcare Center;  
Palmetto Health Care, LLC; and  
Richard Porter, Individually, are

Petitioners.

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**PROOF OF SERVICE**

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CLEMENT RIVERS, LLP

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

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*Attorneys for Petitioners*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioners, hereby certify that Petitioners' **MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI** was served on all other parties to this appeal on March 5, 2024, via email (see attached) to their following counsel of record:

Dirk J. Derrick, Esquire, [dirk@derricklawfirm.com](mailto:dirk@derricklawfirm.com)  
S. Taylor Hooven, Esquire, [taylor@derricklawfirm.com](mailto:taylor@derricklawfirm.com)  
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P.O. Box 28  
Conway, SC 29528  
*Attorneys for Respondent*

I also certify that Petitioners' **MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI** and **PROOF OF SERVICE** were filed with the South Carolina Court of Appeals on March 5, 2024, via email (see attached) to [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org).

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Russell G. Hines (SC Bar No. 72100)  
*Attorneys for Petitioners*

Charleston, South Carolina

March 5, 2024

**From:** [Bell, Pollyana \(Polly\)](#)  
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**Subject:** Greene v. Palmetto Prince George; Appellate Case No. 2020-001167 (CR 200085)  
**Date:** Tuesday, March 5, 2024 3:51:57 PM  
**Attachments:** [Mot. for Ext. -Petition for Writ of Cert-Greene.pdf](#)  
[image001.png](#)

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Enclosed please find Petitioners' Motion for Extension of Time to Serve/File Petition for Writ of Certiorari for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell  
Project Assistant  
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