

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

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Appeal from Georgetown County  
Court of Common Pleas

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Unpublished Opinion No. 2023-UP-396, (S.C. Ct.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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**MOTION FOR EXTENSION OF TIME TO SERVE/FILE  
PETITION FOR WRIT OF CERTIORARI**

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CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
Russell G. Hines (SC Bar No. 72100)  
Matthew O Riddle (SC Bar No. 76650)  
Gaillard T. Dotterer, III (SC Bar No. 103620)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Petitioners*

NOW COME Petitioners, Palmetto Prince George Operating, LLC d/b/a Prince George Healthcare Center, Palmetto Health Care, LLC, and Richard Porter, by and through their undersigned counsel, on the grounds stated below, pursuant to Rule 263(b), SCACR, as well as the Court's order of July 16, 2014, regarding Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals, and hereby move for an extension of ten (10) days' time to file/serve their petition to this Court for issuance of a writ of certiorari to the Court of Appeals to review its decision in this matter.

Pursuant to Rule 242(c), SCACR, the present deadline for the petition for writ of certiorari is March 6, 2024. Due to other time commitments, both work- and non-work-related, the undersigned counsel for Petitioner requests ten (10) additional days, beyond March 6, 2024, to prepare Petitioner's petition seeking this Court's review of the Court of Appeals' decision via writ of certiorari, and the undersigned submits there is good cause to allow the requested dispensation: It is in furtherance of the interests of justice; it will not work any undue prejudice upon any other party; and it is consistent with the extension protocol established by the Court's aforementioned order of July 16, 2014.

WHEREFORE, Petitioners respectfully request that this Honorable Court grant them an extension of ten (10) days' time to file/serve their petition for writ of certiorari. With the extension requested herein, the new deadline for filing/serving

their petition for writ of certiorari would be March 18, 2024,<sup>1</sup> according to the undersigned's calculations. Further, Petitioners respectfully request the Court hold the present deadline in abeyance until it acts upon this motion.

*(Signature page for Second Motion for Extension of Time to Petition for Rehearing, Appeal No. 2020-001167)*

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)  
Russell G. Hines (SC Bar No. 72100)  
Matthew O Riddle (SC Bar No. 76650)  
Gaillard T. Dotterer, III (SC Bar No. 103620)  
25 Calhoun Street, Suite 400  
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P.O. Box 993 (29402)  
(843) 720-5488  
*Attorneys for Petitioners*

Charleston, South Carolina

March 5, 2024

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<sup>1</sup> Calculating the 10-day period in accordance with Rule 263(a), SCACR, it runs until Monday, March 18, 2024, because the 10<sup>th</sup> day is Saturday, March 16, 2024.

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**SC Court of Appeals**

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Petitioners.

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**PROOF OF SERVICE**

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CLEMENT RIVERS, LLP

Stephen L. Brown (SC Bar No. 66468)

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

Russell G. Hines (SC Bar No. 72100)

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Charleston, South Carolina 29401

P.O. Box 993 (29402)

(843) 720-5488

*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)  
The Derrick Law Firm  
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 \(Polly\)](#)  
**To:** [dirk@derricklawfirm.com](mailto:dirk@derricklawfirm.com); [taylor@derricklawfirm.com](mailto:taylor@derricklawfirm.com)  
**Cc:** [Justman, Aimee](#); [Hines, Russell](#)  
**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  
Commercial Litigation Practice Group  
Phone:(843)720-5488 | Fax:(843)579-1369



**CLEMENT RIVERS, LLP**  
25 Calhoun Street • Suite 400 • Charleston, SC 29401  
[yctrlaw.com](http://yctrlaw.com)