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Mar 05 2024

SC Court of Appeals

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

Appeal from Colleton County
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

Case No. 2021-CP-15-00657

Unpublished Opinion No. 2023-UP-397 (S.C. Ct. App. filed Dec. 13, 2023)

Jennifer Rahn,
as Personal Representative of the Estate of Robert Ramsey,

Respondent,

v.

Priority Home Care, LLC, and
St. George Health Care, LLC, d/b/a St. George Healthcare Center,

Defendants,

Of which St. George Health Care, LLC, d/b/a St. George
Healthcare Center is

Petitioner.

**MOTION FOR EXTENSION OF TIME TO FILE/SERVE
PETITION FOR WRIT OF CERTIORARI**

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)
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 Petitioner

NOW COMES Petitioner, St. George Health Care, LLC, d/b/a St. George Healthcare Center, by and through its 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 moves for an extension of ten (10) days' time to file/serve its 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 that 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, Petitioner respectfully requests that this Honorable Court grant an extension of ten (10) days' time to file/serve the petition for writ of certiorari. With the extension requested herein, the new deadline for filing/serving

the petition for writ of certiorari would be March 18, 2024,¹ according to the undersigned's calculations. Further, Petitioner respectfully requests the Court hold the present deadline in abeyance until it acts upon this motion.

[signature page for Motion for Extension of Time to Petition for Writ of Certiorari]

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)
James D. Gandy, III (SC Bar No. 11925)
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(843) 720-5488
Attorneys for Petitioner

Charleston, South Carolina

March 5, 2024

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

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Of which St. George Health Care, LLC, d/b/a St. George
Healthcare Center is

Petitioner.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
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Attorneys for Petitioner

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioner, hereby certify that Appellant's **MOTION FOR EXTENSION OF TIME TO PETITION FOR WRIT OF CERTIORARI** was served on Respondent and on Defendant Priority Home Care, LLC, on March 5, 2024, by emailing (see attached) a copy of the same to their following counsel of record:

PARKER LAW GROUP, LLP
Lee D. Cope, Esquire
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John E. Parker, Jr., Esquire
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-and-

HETRICK, HARVIN & BONDS, LLC
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*Attorneys for Respondent
Jennifer Rahn, as Personal Representative
of the Estate of Robert Ramsey*

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*Attorneys for Defendant
Priority Home Care, LLC*

I also certify that Petitioner's **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.

Respectfully submitted,
CLEMENT RIVERS, LLP

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

Charleston, South Carolina

March 5, 2024

From: [Bell, Pollyana \(Polly\)](#)
To: lcope@parkerlawgroupsc.com; jayparker@parkerlawgroupsc.com; sharvin@lowcountry.com; mdc@barnwell-whaley.com; sclarke@barnwell-whaley.com
Cc: [Hines, Russell](#); [Justman, Aimee](#)
Subject: Rahn v. Priority Home Care; Appellate Case No. 2022-001242 (CR 210888)
Date: Tuesday, March 5, 2024 4:41:35 PM
Attachments: [image001.png](#)
[Mot. for Ext. Petition for Writ of Cert -Rahn.pdf](#)

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

Thank you,

Pollyana Bell
Project Assistant
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Phone:(843)720-5488 | Fax:(843)579-1369



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