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SC Court of Appeals

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

Appeal from Marion County
Court of Common Pleas
H. Steven DeBerry IV, Circuit Court Judge

Case No. 2022-CP-33-00183
Appellate Case No. 2023-001712

Rebecca C. Hagood
as Personal Representative of the Estate of Frank D. Chavis, Sr.,

Respondent,

v.

Palmetto Faith Operating, LLC
d/b/a Faith Healthcare Center and
Brooks Arnette,

Appellants.

**SECOND MOTION FOR EXTENSION OF TIME
TO FILE/SERVE INITIAL BRIEF OF APPELLANTS**

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
Matthew O. Riddle (SC Bar No. 76650)
Kara S. Grevey (SC Bar No. 101742)
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25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
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(843) 720-5488

Attorneys for Appellants

NOW COME Appellants Palmetto Faith Operating, LLC d/b/a Faith Healthcare Center and Brooks Arnette, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an extension of thirty (30) days' additional time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed February 6, 2024, the deadline for Appellants' initial brief and designation of matter is March 6, 2024. On account of work-related and other time commitments, Appellants respectfully request this deadline be extended by 30 days. Respectfully, Appellants believe this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellants move this Honorable Court to grant them an extension of 30 days' time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving their initial brief and designation of matter would be April 5, 2024, according to the undersigned's calculations. Further, Appellants respectfully request the Court hold the present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

[signature on following page]

[Signature page for Second Motion for Extension of Time to File/Serve Initial Brief of Appellants, Appellate Case No. 2023-001712]

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Stephen L. Brown (SC Bar No. 66468)
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Attorneys for Appellants

Charleston, South Carolina

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PROOF OF SERVICE

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Attorneys for Appellants

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that the **SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANTS** was served on Respondent on March 5, 2024, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

A. Keith McAlister Jr., Esquire
HAWK LAW GROUP
kmcalister@hawklawgroup.com

Attorney for Respondent

Respectfully submitted,
CLEMENT RIVERS, LLP

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

Attorneys for Appellants

Charleston, South Carolina

March 5, 2024

From: [Bell, Pollyana \(Polly\)](#)
To: [Kip McAlister](#)
Cc: [Hines, Russell](#); [Justman, Aimee](#)
Subject: Hagood v. Palmetto Faith Operating; Appellate Case No. 2023-001712 (CR 210731)
Date: Tuesday, March 5, 2024 3:06:00 PM
Attachments: [2nd Motion for Extension - Initial Brief.pdf](#)
[image001.png](#)

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

Thank you,

Pollyana Bell
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