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Mar 14 2024

SC Court of Appeals

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

Appeal from Georgetown County
Court of Common Pleas
Benjamin H. Culbertson, Circuit Court Judge

Case No. 2019-CP-22-00961
Court of Appeals Case No. 2020-001167
Supreme Court Case No. 2024-000305

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.

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

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)
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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.

Presently, by order of this Court filed March 6, 2024, the deadline for the petition for writ of certiorari is March 18, 2024. Due to other time commitments, both work- and non-work-related, the undersigned counsel for Petitioner requests ten (10) additional days, beyond March 18, 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 28, 2024, 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)
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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.

PROOF OF SERVICE

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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Attorneys for Petitioners

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioners, hereby certify that Petitioners' **SECOND MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI** was served on all other parties to this appeal on March 14, 2024, via email (see attached) to their following counsel of record:

Dirk J. Derrick, Esquire, dirk@derricklawfirm.com
S. Taylor Hooven, Esquire, taylor@derricklawfirm.com
The Derrick Law Firm
P.O. Box 28
Conway, SC 29528
Attorneys for Respondent

I also certify that Petitioners' **SECOND 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 14, 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 Petitioners

Charleston, South Carolina

March 14, 2024

From: [Bell, Pollyana \(Polly\)](#)
To: dirk@derricklawfirm.com; taylor@derricklawfirm.com
Cc: [Justman, Aimee](#); [Hines, Russell](#)
Subject: Greene v. Palmetto Prince George; Sup. Ct. Case No. 2024-000305 ; Ct. App. Case No. 2020-001167 (CR 200085)
Date: Thursday, March 14, 2024 5:37:19 PM
Attachments: [2nd Motion for Extension - Petition for Writ of Certiorari.pdf](#)
[image001.png](#)

Enclosed please find Petitioners' Second 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



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