

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

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**Apr 26 2024**

**S.C. SUPREME COURT**

Appeal from Florence County  
Court of Common Pleas  
William H. Seals Jr., Circuit Court Judge

Case No. 2020-CP-21-02290  
Unpublished Opinion No. 2024-UP-005 (S.C. Ct. App. filed Jan. 3, 2024)

Mary Tisdale  
as Personal Representative of the Estate of Earlene Seabrook,

Respondent,

v.

Palmetto Lake City Operating, LLC  
d/b/a Lake City-Scranton Healthcare Center  
and Jeffrey Gibbs,

Defendants,

Of whom Palmetto Lake City Operating, LLC  
d/b/a Lake City-Scranton 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)  
Matthew O. Riddle (SC Bar No. 76650)  
Russell G. Hines (SC Bar No. 72100)  
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(843) 720-5488  
*Attorneys for Petitioner*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioner, hereby certify that the **SECOND MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI** was served on Respondent, Mary Tisdale, as Personal Representative of the Estate of Earlene Seabrook, on April 26, 2024, by emailing (see attached) a copy of the same to Respondent's counsel of record:

D. Nathan Hughey, Esquire  
[nate@hugheylawfirm.com](mailto:nate@hugheylawfirm.com)

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*-and-*

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*Attorneys for Respondent*

I also certify that Petitioner's **SECOND MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI** and **PROOF OF SERVICE** was filed with the South Carolina Court of Appeals on April 26, 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 Petitioner*

Charleston, South Carolina

April 26, 2024

**From:** [Bell, Pollyana \(Polly\)](#)  
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**Cc:** [Hines, Russell](#); [Justman, Aimee](#)  
**Subject:** Tisdale v. Palmetto Lake City; Sup. Ct. 2024-000615 //Ct. App. 2021-000586 (CR 200486)  
**Date:** Friday, April 26, 2024 1:10:09 PM  
**Attachments:** [2nd Motion for Extension - Petition for Writ.pdf](#)  
[image001.png](#)

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

Thank you,

Pollyana Bell  
Project Assistant  
Commercial Litigation Practice Group  
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