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**Jun 04 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM MARION COUNTY  
Court of Common Pleas

H. Steven DeBerry, IV, Circuit Court Judge

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Appellate Case No. 2023-001712

Lower Court Case No. 2022-CP-33-00183

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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.

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

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*Attorney for Respondent*

NOW COMES Respondent Rebecca Hagood, as Personal Representative of the Estate of Frank D. Chavis, Sr., by and through her undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of an additional thirty (30) days to file/serve Respondent's initial brief and corresponding designation of matter to be included in the record on appeal.

By Order of this Court filed May 13, 2024, the deadline for Respondent's initial brief and designation of matter is June 5, 2024. On account of work-related and other time commitments, Respondent respectfully requests this deadline be extended by thirty (30) days. Respectfully, Respondent believes this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellants.

WHEREFORE, Respondent moves this Honorable Court to grant them an extension of thirty (30) days 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 Respondent's initial brief and designation of matter would be July 5, 2024, according to the undersigned's calculations.

FURTHER, Respondent respectfully requests the Court hold the present initial briefing/designation of matter deadline in abeyance until it acts upon this motion.

Respectfully submitted,

s/ A. Keith McAlister, Jr.  
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*Attorney for Respondent*

Aiken, South Carolina  
June 4, 2024

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Appellants.

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**PROOF OF SERVICE**

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*Attorney for Respondent*

I, A. Keith McAlister, Jr., of the Hawk Law Group, attorney for Respondent, hereby certify that the **MOTION FOR SECOND EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF RESPONDENT** was served on Appellants on June 4, 2024, by emailing (see attached email) a copy of the same to Appellants' counsel of record:

Stephen L. Brown, Esquire  
D. Jay Davis, Jr., Esquire  
Matthew O. Riddle, Esquire  
Kara S. Grevey, Esquire  
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*Attorneys for Appellants*

Respectfully submitted,

HAWK LAW GROUP

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*Attorney for Respondent*

Aiken, South Carolina

June 4, 2024

**From:** [Donna Boone](#)  
**To:** ["RHines@ycrlaw.com"](#); ["Ajustman@ycrlaw.com"](#); ["pbell@ycrlaw.com"](#); ["sbrown@ycrlaw.com"](#); ["Davis, Jay"](#); ["Riddle, Matthew"](#); ["kgrevey@ycrlaw.com"](#); ["spreiser@ycrlaw.com"](#); ["speterson@ycrlaw.com"](#); ["bwakeham@ycrlaw.com"](#)  
**Cc:** [Kip McAlister](#)  
**Subject:** RE: Hagood v. Palmetto Faith Operating; Appellate Case No. 2023-001712 (CR 210731)  
**Date:** Tuesday, June 4, 2024 11:00:00 AM  
**Attachments:** [Respondent's Motion for Second Extension.pdf](#)  
[Proof of Service - Respondent's Motion for 2nd Extension - Initial Reply Brief.pdf](#)

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Good morning!

Attached please find for service upon you Respondent's Motion for Second Extension of Time to File/Serve Initial Brief of Respondent and Proof of Service in the above-referenced matter.

Thank you!

Donna Boone  
Senior Paralegal  
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