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**Jul 24 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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Case No. 2022-CP-33-00183  
Appellate Case No. 2023-001712

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

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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)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(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 a second extension of ten (10) days' additional time to file/serve their initial reply brief.

Presently, by order of this Court filed July 16, 2024, the deadline for Appellants' initial reply brief and designation of matter is July 25, 2024. On account of work-related and other time commitments, Appellants respectfully request this deadline be extended by 10 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 a second extension of 10 days' time to file/serve their initial reply 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 reply brief would be August 5, 2024, according to the undersigned's calculations. Further, Appellants respectfully request the Court hold the present 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  
Reply 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)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
Matthew O. Riddle (SC Bar No. 76650)  
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*Attorneys for Appellants*

Charleston, South Carolina

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

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**PROOF OF SERVICE**

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CLEMENT RIVERS, LLP  
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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 REPLY BRIEF OF APPELLANTS** was served on Respondent on July 24, 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](mailto: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

July 24, 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:** Wednesday, July 24, 2024 2:16:21 PM  
**Attachments:** [2nd Motion for Extension - Initial Reply Brief.pdf](#)  
[image001.png](#)

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Enclosed please find Appellants' Second Motion for Extension of Time to File/Serve their Initial Reply Brief 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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