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Oct 09 2024

SC Court of Appeals

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

Appeal from Colleton County
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

Appellate Case No. 2023-001282
Circuit Court Case No. 2021-CP-15-00516

Gabrielle Washington
as Personal Representative of the Estate of Walter Washington, Jr.,

Respondent,

v.

St. George Health Care, LLC, d/b/a St. George Healthcare Center and
Walterboro Community Hospital, Inc., d/b/a Colleton Medical Center,

Defendants,

Of which St. George Health Care, LLC, d/b/a St. George Healthcare Center is

Appellant.

**MOTION FOR EXTENSION OF TIME
TO PETITION FOR REHEARING**

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D. Jay Davis, Jr. (SC Bar No. 12084)
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Attorneys for Appellant

COMES NOW Appellant, St. George Health Care, LLC, d/b/a St. George Healthcare Center, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of fifteen (15) days' additional time to file/serve a petition for rehearing of this matter, which the Court decided via opinion filed September 25, 2024. *See Gabrielle Washington v. St. George Health Care, LLC*, Unpublished Op. No. 2024-UP-319.

Rule 221(a), SCACR, provides, "Petitions for rehearing must be actually received by the appellate court no later than fifteen (15) days after the filing of the opinion, order, judgment, or decree of the court." Based on the September 25, 2024, filing of the Court's opinion in this case, the present deadline to petition for rehearing is the close of business October 10, 2024, which, in accordance with Rule 263(a), SCACR (regarding computation of time), is the 15th day after the opinion's filing. Because of work-related and other time commitments, the undersigned counsel for Appellant requests the Court's allowance of fifteen (15) days' additional time to petition for rehearing.

Respectfully, the undersigned submits there is good cause for the Court to grant the relief requested herein, as it is, under the circumstances, a reasonable dispensation, timely sought, consistent with the interests of justice, posing no threat of undue prejudice to any other party.

WHEREFORE, Appellant requests that the Court grant it an extension of 15 days' time to petition for rehearing. By the undersigned's calculations, the grant of this relief would make the new deadline to petition for rehearing October 25, 2024. ADDITIONALLY, for the same reasons set forth in support of the within request for an extension of time, Appellant requests the Court hold the present deadline for petitioning for rehearing in abeyance until the Court acts on this motion.

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
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Charleston, South Carolina

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Appellant.

PROOF OF SERVICE

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Attorneys for Appellant

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, hereby certify that **MOTION FOR EXTENSION OF TIME TO PETITION FOR REHEARING** was served on Respondent and Defendant Walterboro Community Hospital, Inc. d/b/a Colleton Medical Center on October 9, 2024, via email (see attached) to their following counsel of record:

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-and-

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Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines
Attorneys for Appellant

Charleston, South Carolina

October 9, 2024

From: [Bell, Pollyana \(Polly\)](#)
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Subject: Washington v. St. George Health Care; Appellate Case No. 2023-001282 (CR 210566)
Date: Wednesday, October 9, 2024 10:55:50 AM
Attachments: [Motion for Extension - Petition for Rehearing.pdf](#)
[Motion to withdraw counsel - GTD.pdf](#)
[image001.png](#)

Enclosed please find Appellant's Motion for Extension of Time to Petition for Rehearing and Motion to Withdraw as Counsel of Record for service upon you in the above-referenced matter.

Thank you,

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