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Nov 12 2024

SC Court of Appeals

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

Appeal from Dorchester County
Court of Common Pleas

Heath P. Taylor, Circuit Court Judge

Case No. 2023-CP-18-01775
Appellate Case No. 2024-000914

Kevin White,
as Personal Representative of the Estate of Mary Brisbon,

Respondent,

v.

St. George Health Care, LLC, d/b/a St. George Healthcare Center and
Vicki Sides,

Appellants.

**MOTION FOR EXTENSION OF TIME TO FILE/SERVE
RETURN TO MOTION TO DISMISS APPEAL**

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)
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P.O. Box 993 (29402)
Charleston, South Carolina 29401
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Attorneys for Appellants

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COME NOW Appellants, St. George Health Care, LLC, d/b/a St. George Healthcare Center and Vicki Sides, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an extension of ten (10) days' additional time to file/serve their return to the motion to dismiss appeal.

Pursuant to Rule 240(e), SCACR, the present deadline for Appellants' return to the motion to dismiss appeal is November 12, 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 an extension of 10 days' time to file/serve their return to the motion to dismiss appeal. With the extension requested herein, the new deadline to file/serve their return to the motion to dismiss appeal would be November 22, 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.

[Signed on next page]

[Signature page for Second Motion for Extension of Time to File/Serve Return to Motion to Dismiss Appeal, Appellate No. 2024-000914]

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Stephen L. Brown (SC Bar No. 66468)
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Charleston, South Carolina

November 22, 2024

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Appeal from Dorchester County
Court of Common Pleas

Heath P. Taylor, Circuit Court Judge

Case No. 2023-CP-18-01775
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Kevin White,
as Personal Representative of the Estate of Mary Brisbon,

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St. George Health Care, LLC, d/b/a St. George Healthcare Center and
Vicki Sides,

Appellants.

PROOF OF SERVICE

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Attorneys for Appellants

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that Appellants' **MOTION FOR EXTENSION OF TIME TO FILE/SERVE RETURN TO MOTION TO DISMISS APPEAL** was served on Respondent on November 11, 2024, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

PARKER LAW GROUP, LLP
Lee D. Cope, Esquire
lcope@parkerlawgroupsc.com
John E. Parker, Jr., Esquire
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-and-

BRIGHT MATTHEWS LAW FIRM, LLC
Margie Bright Matthews, Esquire
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Attorneys 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

November 22, 2024

From: [Bell, Pollyana \(Polly\)](#)
To: lcope@parkerlawgroupsc.com; margie@brightmatthewslaw.com; jayparker@parkerlawgroupsc.com; teamcope@parkerlawgroupsc.com; teamjohnny@parkerlawgroupsc.com; ccartier@parkerlawgroupsc.com
Cc: [Hines, Russell](#); [Justman, Aimee](#)
Subject: White v. St. George Healthcare, LLC; Appellate Case No. 2024-000914 (CR 220538)
Date: Monday, November 11, 2024 3:24:21 PM
Attachments: [Mot. for Ext -Return to MTD \(2\).pdf](#)
[image001.png](#)

Enclosed please find Appellants' Motion for Extension of Time to File/Serve their Return to Motion to Dismiss Appeal for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell
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