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**Nov 12 2024**

**SC Court of Appeals**

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

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Appeal from Dorchester County  
Court of Common Pleas

Heath P. Taylor, Circuit Court Judge

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Case No. 2023-CP-18-00722  
Appellate Case No. 2024-000910

Beverly Calloway,  
as Personal Representative of the Estate of Hattie Admore,

Respondent,

v.

Oakbrook Healthcare, LLC d/b/a Oakbrook Health and  
Rehabilitation Center and Patricia Castle,

Appellants.

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

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CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
James D. Gandy III (SC Bar No. 11925)  
T. Ashton Phillips III (SC Bar No. 104227)  
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(843) 720-5488

*Attorneys for Appellants*

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

COME NOW Appellants, Oakbrook Healthcare, LLC d/b/a Oakbrook Health and Rehabilitation Center and Patricia Castle, 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 Motion for Extension of Time to File/Serve Return to Motion to Dismiss Appeal, Appellate No. 2024-000910]*

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 11, 2024

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Appellants.

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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 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  
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*-and-*

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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 11, 2024

**From:** [Bell, Pollyana \(Polly\)](#)  
**To:** [lcope@parkerlawgroupsc.com](mailto:lcope@parkerlawgroupsc.com); [margie@brightmatthewslaw.com](mailto:margie@brightmatthewslaw.com); [jayparker@parkerlawgroupsc.com](mailto:jayparker@parkerlawgroupsc.com); [teamcope@parkerlawgroupsc.com](mailto:teamcope@parkerlawgroupsc.com); [teamjohnny@parkerlawgroupsc.com](mailto:teamjohnny@parkerlawgroupsc.com); [ccartier@parkerlawgroupsc.com](mailto:ccartier@parkerlawgroupsc.com)  
**Cc:** [Hines, Russell](#); [Justman, Aimee](#)  
**Subject:** Calloway v. Oakbrook Healthcare, LLC; Appellate Case No. 2024-000910 (CR 230144)  
**Date:** Monday, November 11, 2024 3:11:56 PM  
**Attachments:** [Mot. for Ext -Return to MTD.pdf](#)  
[image001.png](#)

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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  
Project Assistant  
Commercial Litigation Practice Group  
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