

**RECEIVED**

**Nov 21 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.

---

**SECOND 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)  
T. Ashton Phillips III (SC Bar No. 104227)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
P.O. Box 993 (29402)  
Charleston, South Carolina 29401  
(843) 720-5488

*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 a second extension of ten (10) days' additional time to file/serve their return to the motion to dismiss appeal.

Presently, by order of this Court filed November 12, 2024, the deadline for Appellants' return to the motion to dismiss appeal is November 22, 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 December 2, 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)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
Matthew O. Riddle (SC Bar No. 76650)  
T. Ashton Phillips III (SC Bar No. 104227)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
P.O. Box 993 (29402)  
Charleston, South Carolina 29401  
(843) 720-5488  
*Attorneys for Appellants*

Charleston, South Carolina

November 21, 2024

**RECEIVED**

**Nov 21 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.

---

**PROOF OF SERVICE**

---

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)  
T. Ashton Phillips III (SC Bar No. 104227)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
P.O. Box 993 (29402)  
Charleston, South Carolina 29401  
(843) 720-5488

*Attorneys for Appellants*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that Appellants' **SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE RETURN TO MOTION TO DISMISS APPEAL** was served on Respondent on November 21, 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](mailto:lcope@parkerlawgroupsc.com)  
John E. Parker, Jr., Esquire  
[jayparker@parkerlawgroupsc.com](mailto:jayparker@parkerlawgroupsc.com)

*-and-*

BRIGHT MATTHEWS LAW FIRM, LLC  
Margie Bright Matthews, Esquire  
[margie@brightmatthewslaw.com](mailto:margie@brightmatthewslaw.com)

*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 21, 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:** White v. St. George Healthcare, LLC; Appellate Case No. 2024-000914 (CR 220538)  
**Date:** Thursday, November 21, 2024 5:17:09 PM  
**Attachments:** [2nd Motion for Extension - Return to Motion to Dismiss.pdf](#)  
[image001.png](#)

---

Enclosed please find Appellants' Second 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  
Phone:(843)720-5488 | Fax:(843)579-1369



**CLEMENT RIVERS, LLP**  
25 Calhoun Street • Suite 400 • Charleston, SC 29401  
[yctrlaw.com](http://yctrlaw.com)