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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.

**THIRD 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)
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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 a third 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 22, 2024, the deadline for Appellants' return to the motion to dismiss appeal is December 3, 2024. Appellants' counsel recognizes the notice in the Court's November 22, 2024 order that no further extensions will be granted absent extraordinary circumstances. Mr. Hines had hoped to be able to complete the return to the motion to dismiss appeal in a timely manner, but on account of the recent Thanksgiving holiday and his related out-of-town travel, he was unable to do so, and he humbly asks that the Court consider the circumstances (disruption to his normal work schedule) as sufficiently out of the ordinary to merit granting the dispensation requested herein, which he most respectfully submits is consistent with the interests of justice and will not unduly prejudice any other party.

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 13, 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 page for Third 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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December 2, 2024

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Court of Common Pleas

Heath P. Taylor, Circuit Court Judge

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

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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' **THIRD MOTION FOR EXTENSION OF TIME TO FILE/SERVE RETURN TO MOTION TO DISMISS APPEAL** was served on Respondent on December 2, 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
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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

December 2, 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, December 2, 2024 3:01:11 PM
Attachments: [3rd Motion for Extension - Return to Motion to Dismiss.pdf](#)
[image001.png](#)

Enclosed please find Appellants' Third 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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