

**RECEIVED**

**Jan 15 2025**

**SC Court of Appeals**

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

---

Appeal from Colleton County  
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

---

Court of Appeals Case No. 2023-001282  
Circuit Court Case No. 2021-CP-15-00516  
Unpublished Opinion No. 2024-UP-319, (S.C. Ct. App. filed September 25, 2024)

---

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

Petitioner.

---

**MOTION FOR EXTENSION OF TIME  
TO FILE/SERVE PETITION FOR WRIT OF CERTIORARI**

---

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)  
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 Petitioner*

COMES NOW Petitioner, St. George Health Care, LLC, d/b/a St. George Healthcare Center, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, as well as the Court's order of July 16, 2014, regarding Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals, and hereby moves for an extension of ten (10) days' time to file/serve its petition to this Court for issuance of a writ of certiorari to the Court of Appeals to review its decision in this matter.

Pursuant to Rule 242(c), SCACR, the present deadline for the petition for writ of certiorari is today, Wednesday, January 15, 2025. Due to other time commitments, both work- and non-work-related, the undersigned counsel for Petitioner requests ten (10) additional days to prepare Petitioner's petition seeking this Court's review of the Court of Appeals' decision via writ of certiorari, and the undersigned submits that there is good cause to allow the requested dispensation: It is in furtherance of the interests of justice; it will not work any undue prejudice upon any other party; and it is consistent with the extension protocol established by the Court's aforementioned order of July 16, 2014.

WHEREFORE, Petitioner respectfully requests this Honorable Court grant it an extension of ten (10) days' time to file/serve its petition for writ of certiorari. With the extension requested herein, the new deadline for filing/serving the petition for writ of certiorari would be January 27, 2025, according to the

undersigned's calculations. Further, Petitioner respectfully requests the Court hold this present deadline in abeyance until it acts upon this motion.

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
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)  
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 Petitioner*

Charleston, South Carolina

January 15, 2025

**RECEIVED**

**Jan 15 2025**

**SC Court of Appeals**

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

---

Appeal from Colleton County  
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

---

Court of Appeals Case No. 2023-001282  
Circuit Court Case No. 2021-CP-15-00516  
Unpublished Opinion No. 2024-UP-319, (S.C. Ct. App. filed September 25, 2024)

---

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

Petitioner.

---

**PROOF OF SERVICE**

---

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)  
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 Petitioner*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioner, hereby certify that Petitioner's **MOTION FOR EXTENSION OF TIME TO FILE/SERVE PETITION FOR WRIT OF CERTIORARI** was served on Respondent and Defendant Walterboro Community Hospital, Inc. d/b/a Colleton Medical Center on January 15, 2024, via email (see attached) to their following counsel of record:

Lee D. Cope, Esquire  
[lcope@parkerlawgroupsc.com](mailto:lcope@parkerlawgroupsc.com)  
John E. Parker, Jr., Esquire  
[jayparker@parkerlawgroupsc.com](mailto:jayparker@parkerlawgroupsc.com)  
PARKER LAW GROUP, LLP

*-and-*

Shane M. Burroughs, Esquire  
[shane@landblawfirm.com](mailto:shane@landblawfirm.com)  
LANIER & BURROUGHS, LLC  
*Attorneys for Respondent Gabrielle  
Washington as Personal Representative  
of the Estate of Walter Washington, Jr.*

Emily Collins Brown, Esquire  
[emily@basjlaw.com](mailto:emily@basjlaw.com)  
Weldon R. Johnson, Esquire  
[weldon@basjlaw.com](mailto:weldon@basjlaw.com)  
Creasie Parrott Schlachter, Esquire  
[creasie@basjlaw.com](mailto:creasie@basjlaw.com)  
BARNES, ALFORD, STORK &  
JOHNSON, LLP  
*Attorneys for Defendant Walterboro  
Community Hospital, Inc. d/b/a Colleton  
Medical Center*

I also certify that Petitioner's **MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI** and **PROOF OF SERVICE** was filed with the South Carolina Court of Appeals on January 15, 2025, via email (see attached) to [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org).

Respectfully submitted,  
CLEMENT RIVERS, LLP

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

Charleston, South Carolina

January 15, 2025

**From:** [Bell, Pollyana \(Polly\)](#)  
**To:** [lcope@parkerlawgroupsc.com](mailto:lcope@parkerlawgroupsc.com); [jayparker@parkerlawgroupsc.com](mailto:jayparker@parkerlawgroupsc.com); [weldon@basjlaw.com](mailto:weldon@basjlaw.com); [emily@basjlaw.com](mailto:emily@basjlaw.com); [creasie@basjlaw.com](mailto:creasie@basjlaw.com); [shane@landblawfirm.com](mailto:shane@landblawfirm.com); [ccartier@parkerlawgroupsc.com](mailto:ccartier@parkerlawgroupsc.com)  
**Cc:** [Hines, Russell](#); [Justman, Aimee](#)  
**Subject:** Washington v. St. George Health Care; Ct. App. Case No. 2023-001282 (CR 210566)  
**Date:** Wednesday, January 15, 2025 1:53:58 PM  
**Attachments:** [Motion for Extension - Petition for Writ of Certiorari.pdf](#)  
[image001.png](#)

---

Enclosed please find Petitioner's Motion for Extension of Time to File/Serve their Petition for Writ of Certiorari 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  
[ycrilaw.com](http://ycrilaw.com)