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Jan 27 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Unpublished Opinion No. 2024-UP-319, (S.C. Ct.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.

**SECOND 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)

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(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 a second 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.

Presently, by order of this Court filed January 16, 2025, the deadline for Petitioner's Petition for a Writ of Certiorari is today, Monday, January 27, 2025. Due to other time commitments, both work- and non-work-related, as well as the recent unexpected weather event, 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 February 6, 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
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Charleston, South Carolina

January 27, 2025

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Defendants,

Of which St. George Health Care, LLC, d/b/a St. George Healthcare Center is

Petitioner.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
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Attorneys for Petitioner

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioner, hereby certify that Petitioner's **SECOND 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 27, 2024, via email (see attached) to their following counsel of record:

Lee D. Cope, Esquire
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John E. Parker, Jr., Esquire
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-and-

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Washington as Personal Representative
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*Attorneys for Defendant Walterboro
Community Hospital, Inc. d/b/a Colleton
Medical Center*

I also certify that Petitioner's **SECOND 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 27, 2025, via email (see attached) to ctappfilings@sccourts.org.

Respectfully submitted,
CLEMENT RIVERS, LLP

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

Charleston, South Carolina

January 27, 2025

From: [Bell, Pollyana \(Polly\)](#)
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Cc: [Hines, Russell](#); [Justman, Aimee](#)
Subject: Washington v. St. George Health Care; Sup. Ct. Case No. 2025-000092 ; Ct. App. Case No. 2023-001282 (CR 210566)
Date: Monday, January 27, 2025 1:24:17 PM
Attachments: [2nd Motion for Extension - Petition for Writ of Certiorari.pdf](#)
[image001.png](#)

Enclosed please find Petitioner's Second 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
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