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**Mar 04 2025**

**SC Court of Appeals**

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

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Appeal from Charleston County  
Court of Common Pleas

J. Cordell Maddox Jr., Circuit Court Judge

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Case No. 2022-CP-10-00483

Appellate No. 2025-000070

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Fernesha Mazyck,  
as Personal Representative of the Estate of Ida Braggs,

Respondent,

v.

THI of South Carolina a Charleston, LLC,  
d/b/a Riverside Health and Rehab,

Appellant.

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**MOTION FOR EXTENSION OF TIME  
TO FILE/SERVE INITIAL BRIEF OF APPELLANT**

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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)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
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Charleston, South Carolina 29401  
(843) 720-5488

*Attorneys for Appellant*

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

COMES NOW Appellant, THI of South Carolina at Charleston, LLC d/b/a Riverside Health and Rehab, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of thirty (30) days' additional time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, in accordance with Rule 208(a)(1), the deadline for Appellant's initial brief and designation of matter is March 4, 2025. On account of work-related and other time commitments, Appellant respectfully requests this deadline be extended by 30 days. Respectfully, Appellant believes this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellant moves this Honorable Court to grant it an additional extension of 30 days' time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving its initial brief and designation of matter would be April 3, 2025, according to the undersigned's calculations. Further, Appellant respectfully requests the Court hold the present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

*[signature on next page]*

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)  
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*Attorneys for Appellant*

Charleston, South Carolina

March 4, 2025

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**PROOF OF SERVICE**

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CLEMENT RIVERS, LLP  
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*Attorneys for Appellant*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, hereby certify that Appellant's **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANT** was served on Respondent on March 4, 2025, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

Grahame E. Holmes, Esquire  
PARKER LAW GROUP, LLP  
[gholmes@parkerlawgroupsc.com](mailto:gholmes@parkerlawgroupsc.com)

*Attorney for Respondent*

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Russell G. Hines (SC Bar No. 72100)

*Attorneys for Appellant*

Charleston, South Carolina

March 4, 2025

**From:** [Bell, Pollyana \(Polly\)](#)  
**To:** [Grahame Holmes](#)  
**Cc:** [Hines, Russell](#); [Justman, Aimee](#)  
**Subject:** Mazyck v. THI; Appellate Case No. 2025-000070 (CR 211023)  
**Date:** Tuesday, March 4, 2025 11:47:06 AM  
**Attachments:** [image001.png](#)  
[Motion for Extension - Initial Brief.pdf](#)

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Enclosed please find Appellant's Motion for Extension of Time to File/Serve their Initial Brief 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



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