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Apr 09 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
The Honorable Jocelyn Newman, Circuit Court Judge

Civil Action No.:2023CP4003086
Appeal Number: 2024-001802

Jennifer Murphy, as Personal Representative of the Estate of Phyllis Gee...Plaintiff/Appellant,

v.

All Seasons Healthcare, LLC, All Seasons Healthcare, Inc., and TWG Polo Road, LLC d/b/a
Mill Creek Manor, LLC f/k/a Amara Place at Columbia.....Defendants,

Of whom All Seasons Healthcare, LLC isRespondent.

**RESPONDENT’S MOTION FOR EXTENSION OF TIME TO FILE RESPONDENTS’
INITIAL RESPONSE BRIEF**

Respondent All Seasons Healthcare, Inc., hereby respectfully moves pursuant to Rules 240 and 263 of the South Carolina Appellate Court Rules¹ for an Order granting Respondents a ten (10) day extension of time to file their initial brief in response to Appellant’s Initial Brief filed with the South Carolina Court of Appeals, on the following grounds:

Appellants filed and served their Initial Brief on February 7, 2025, pursuant to an extension granted by this Court. Respondent requires additional time to submit their initial responsive brief, as Respondent did not receive a copy of transcript from the hearing on April 17, 2024, during

¹ Because this Motion contains a full explanation of its grounds, Respondents forego filing a supporting Memorandum, as such Memorandum would serve no useful purpose.

which the parties argued the dispositive motion that is at issue on this appeal until Monday, April 7, 2025.

Because of the forgoing reasons, as well as the fact that counsel for Respondents has had a number of matters to attend to in other State and Federal cases, the undersigned counsel for Respondent requires additional time to complete Respondents' Initial Response Brief in this matter.

Counsel for Respondent would respectfully request an additional ten (10) days from the current deadline in which to file an Initial Response Brief. As set forth above, the undersigned counsel for Respondents is informed and believes that the present deadline to file Respondents' Initial Response Brief is April 9, 2025. The extended deadline, therefore, would be April 21, 2025. No prior request for an extension has been filed by this party.

Respectfully submitted,

/s/Julius W. McKay, II

Julius W. McKay, II

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Attorney for Respondent

Columbia, South Carolina

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on **April 9, 2025**, a copy of the foregoing *Motion for Extension of Time to File Respondent’s Response Brief* was duly served on Appellant at jrutkoksi@kassellaw.com, tmcvey@kassellaw.com, and jkassel@kassellaw.com.