

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

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Appeal from Charleston County  
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

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Case No. 2016-CP-10-05379  
Appellate Case No. 2024-001377

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The Estate of Delila Parrott,

**RECEIVED**

**Apr 11 2025**

**S.C. SUPREME COURT**

Petitioner,

v.

Sandpiper Independent and Assisted Living-Delaware, LLC,

Respondent.

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**MOTION FOR EXTENSION OF TIME TO  
SERVE/FILE BRIEF OF RESPONDENT**

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CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
Matthew O. Riddle (SC Bar No. 76650)  
Russell G. Hines (SC Bar No. 72100)  
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*Attorneys for Respondent*

NOW COMES Respondent, Sandpiper Independent and Assisted Living-Delaware, LLC, by and through its undersigned counsel, on the grounds stated below, 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 the Respondent's Brief.

Pursuant to Rule 242(i), SCACR, the present deadline for Respondent's Brief is April 14, 2025. Due to other time commitments, both work- and non-work-related, as well as a delay for the parties to mediate this case yet again, which was not successful, the undersigned counsel for Respondent requests ten (10) additional days to prepare the Respondent's Brief. The undersigned submits there is good cause to allow this 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, Respondent respectfully requests this Honorable Court grant it an extension of ten (10) days' time to file/serve their Respondent's Brief. With the extension requested herein, the new deadline for filing/serving the Respondent's Brief would be April 24, 2025, according to the undersigned's calculations. Further, Respondent respectfully requests the Court hold this present deadline in abeyance until it acts upon this motion.

*[Signature page for Motion for Extension of Time to Serve/File Brief of Respondent, Appellate Case No. 2024-001377]*

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: *s/Stephen L. Brown*  
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Charleston, South Carolina

April 11, 2025