

RECEIVED

Apr 11 2025

SC Court of Appeals

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

Appeal from Dorchester County
Court of Common Pleas

Heath P. Taylor, Circuit Court Judge

Case No. 2023-CP-18-00722
Appellate Case No. 2024-000910

Beverly Calloway,
as Personal Representative of the Estate of Hattie Admore,

Respondent,

v.

Oakbrook Healthcare, LLC d/b/a Oakbrook Health and
Rehabilitation Center and Patricia Castle,

Appellants.

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

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)
T. Ashton Phillips III (SC Bar No. 104227)
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 Appellants

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

COME NOW Appellants, Oakbrook Healthcare, LLC d/b/a Oakbrook Health and Rehabilitation Center and Patricia Castle, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an extension of ten (10) days' additional time to file/serve their initial reply brief.

Presently, in accordance with Rule 208(a)(3), the deadline for Appellants' initial reply brief is April 14, 2025. On account of work-related and other time commitments, Appellants respectfully request this deadline be extended by 10 days. Respectfully, Appellants believe this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellants move this Honorable Court to grant them an extension of 10 days' time to file/serve their initial reply brief. With the extension requested herein, the new deadline for filing/serving their initial reply brief would be April 24, 2025, according to the undersigned's calculations. Further, Appellants respectfully request the Court hold the present deadline in abeyance until it acts upon this motion.

[Signed on next page]

*[Signature page for Motion for Extension of Time to File/Serve Initial Reply Brief
of Appellant, Appellate No. 2024-000910]*

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)
James D. Gandy III (SC Bar No. 11925)
T. Ashton Phillips III (SC Bar No. 104227)
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 Appellants

Charleston, South Carolina

April 11, 2025

RECEIVED

Apr 11 2025

SC Court of Appeals

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

Appeal from Dorchester County
Court of Common Pleas

Heath P. Taylor, Circuit Court Judge

Case No. 2023-CP-18-00722
Appellate Case No. 2024-000910

Beverly Calloway,
as Personal Representative of the Estate of Hattie Admore,

Respondent,

v.

Oakbrook Healthcare, LLC d/b/a Oakbrook Health and
Rehabilitation Center and Patricia Castle,

Appellants.

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)
T. Ashton Phillips III (SC Bar No. 104227)
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 Appellants

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that Appellants' **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANTS** was served on Respondent on April 11, 2025, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

PARKER LAW GROUP, LLP
Lee D. Cope, Esquire
lcope@parkerlawgroupsc.com
John E. Parker, Jr., Esquire
jayparker@parkerlawgroupsc.com

-and-

BRIGHT MATTHEWS LAW FIRM, LLC
Margie Bright Matthews, Esquire
margie@brightmatthewslaw.com

Attorneys for Respondent

Respectfully submitted,
CLEMENT RIVERS, LLP

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

Attorneys for Appellants

Charleston, South Carolina

April 11, 2025

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Friday, April 11, 2025 4:14 PM
To: lcope@parkerlawgroupsc.com; margie@brightmatthewslaw.com;
jayparker@parkerlawgroupsc.com; teamcope@parkerlawgroupsc.com;
teamjohnny@parkerlawgroupsc.com; ccartier@parkerlawgroupsc.com
Cc: Hines, Russell; Justman, Aimee
Subject: Calloway v. Oakbrook Healthcare, LLC; Appellate Case No. 2024-000910 (CR 230144)
Attachments: 1st Motion for Extension - Initial Reply Brief.pdf

Enclosed please find Appellants' Motion for Extension of Time to File/Serve their Initial Reply Brief for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell

Legal Secretary to Stephen L. Brown,
Russell G. Hines, Stephen A. Griffith, Jr.

Commercial Litigation Practice Group

Phone:(843)720-5488 | Fax:(843)579-1369



CLEMENT RIVERS, LLP
25 Calhoun Street • Suite 400 • Charleston, SC 29401
ycrlaw.com