

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

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Apr 22 2025

APPEAL FROM MARION COUNTY
Court of Common Pleas

S.C. SUPREME COURT

H. Steven DeBerry, IV, Circuit Court Judge

Court of Appeals Case No. 2023-001712
Unpublished Opinion No. 2024-UP-401 (S.C. Ct. App. filed Nov. 27, 2024)

Supreme Court No. 2025-000400

Rebecca C. Hagood
as Personal Representative of the Estate of Frank D. Chavis, Sr.,

Respondent,

v.

Palmetto Faith Operating, LLC
d/b/a Faith Healthcare Center and
Brooks Arnette,

Petitioners.

**MOTION FOR EXTENSION OF TIME TO FILE/SERVE RETURN
TO PETITION FOR A WRIT OF CERTIORARI**

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Attorney for Respondent

NOW COMES Respondent Rebecca Hagood, as Personal Representative of the Estate of Frank D. Chavis, Sr., by and through her undersigned counsel, pursuant to Rule 263(b), SCACR, as well the Court's order of July 16, 2014, and moves for an extension of an additional ten (10) days to file/serve Respondent's Return to Petitioners' Petition for a Writ of Certiorari.

Pursuant to Rule 242(f), SCACR, the deadline for Respondent's Return to Petitioners' Petition for a Writ of Certiorari is April 23, 2025.

On account of work-related and other time commitments, the Respondent respectfully requests this deadline be extended by ten (10) days. Respondent believes this relief is consistent with the interests of justice, will not work any undue prejudice upon Petitioners, and is consistent with the extension protocol established by the Court's aforementioned order of July 16, 2014. Respondent further submits there is good cause to allow the requested dispensation.

WHEREFORE, Respondent moves this Honorable Court to grant her an extension of ten (10) days to file/serve Respondent's Return to Petitioners' Petition for a Writ of Certiorari. With the extension requested herein, the new deadline for filing/serving Respondent's Return to Petitioners' Petition for a Writ of Certiorari would be May 3, 2025, according to the undersigned's calculations. Further, Respondent respectfully requests the Court hold the present deadline in abeyance until it acts upon this motion.

Respectfully submitted,

s/ A. Keith McAlister, Jr.
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