

RECEIVED

Apr 22 2025

SC Court of Appeals

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

APPEAL FROM MARION COUNTY
Court of Common Pleas

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Unpublished Opinion No. 2024-UP-401 (S.C. Ct.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**

HAWK LAW GROUP
A. Keith McAlister, Jr., SC Bar No. 78213
156 Laurens Street NW
Aiken, South Carolina 29801
P: (803) 226-9089
F: (866) 295-0234
kmcalister@hawklawgroup.com

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.

HAWK LAW GROUP

A. Keith McAlister, Jr., SC Bar No. 78213

156 Laurens Street NW

Aiken, South Carolina 29801

P: (803) 226-9089

F: (866) 295-0234

kmcAlister@hawklawgroup.com

Attorney for Respondent

Aiken, South Carolina
April 22, 2025

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

APPEAL FROM MARION COUNTY
Court of Common Pleas

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.

PROOF OF SERVICE

HAWK LAW GROUP
A. Keith McAlister, Jr., SC Bar No. 78213
156 Laurens Street, NW
Aiken, South Carolina 29801
P: (803) 226-9089
F: (866) 295-0234
kmcalister@hawklawgroup.com

Attorney for Respondent

I, A. Keith McAlister, Jr., of the Hawk Law Group, attorney for Respondent, hereby certify that the **MOTION FOR EXTENSION OF TIME TO FILE/SERVE RETURN TO PETITION FOR A WRIT OF CERTIORARI** was served on Petitioners on April 22, 2025, by emailing (see attached email) a copy of the same to Petitioners' counsel of record:

Stephen L. Brown, Esquire
D. Jay Davis, Jr., Esquire
Matthew O. Riddle, Esquire
Kara S. Grevey, Esquire
Russell G. Hines, Esquire
CLEMENT RIVERS, LLP
sbrown@yclaw.com
jdavis@yclaw.com
mriddle@yclaw.com
kgrevey@yclaw.com
rhines@yclaw.com

Attorneys for Petitioners

I also certify that Respondent's **MOTION FOR EXTENSION OF TIME TO SERVE/FILE RETURN TO PETITION FOR WRIT OF CERTIORARI and PROOF OF SERVICE** was filed with the South Carolina Court of Appeals on April 22, 2025, via email (see attached) to ctappfilings@sccourts.org.

Respectfully submitted,

HAWK LAW GROUP

s/A. Keith McAlister, Jr. _____
A. Keith McAlister, Jr., SC Bar No. 78213
156 Laurens Street, NW
Aiken, South Carolina 29801
P: (803) 226-9089
F: (866) 295-0234
kmcalister@hawklawgroup.com

Attorney for Respondent

Aiken, South Carolina

April 22, 2025

From: [Donna Boone](#)
To: sbrown@yclaw.com; [Davis, Jay](#); [Riddle, Matthew](#); kgrevey@yclaw.com; rhines@yclaw.com
Cc: [Kip McAlister](#)
Subject: Hagood v. Palmetto Faith Operating; Sup. Ct. Case No. 2025-000400 ; Ct. App. Case No. 2023-001712
Date: Tuesday, April 22, 2025 3:24:00 PM
Attachments: [R's Motion for Extension re Writ.pdf](#)
[Proof of Service - R's Motion for Extension - Response to Petition for Writ.pdf](#)

On behalf of A. Keith McAlister, Jr., attached please find for service upon you Respondent's Motion for Extension of time to File/Serve Return to Petition for a Writ of Certiorari and Proof of Service in the above-referenced matter.

Thank you!

Donna Boone
Senior Paralegal
HAWK LAW GROUP
156 Laurens Street NW
Aiken, SC 29801
Phone: (803) 226-9089
Fax: 866-234-7943