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May 06 2025

SC Court of Appeals

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

Appeal from Charleston County
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

Case No. 2024-CP-10-03732

Appellate No. 2025-000237

Joe Bryan,

Respondent,

v.

THI of South Carolina at Charleston, LLC
d/b/a Riverside Health and Rehab,

Appellant.

**SECOND MOTION FOR EXTENSION OF TIME TO
FILE/SERVE INITIAL BRIEF OF APPELLANT**

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)

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Charleston, South Carolina 29401

(843) 720-5488

Attorneys for Appellant

COMES NOW Appellant, THI of South Carolina at Charleston, LLC d/b/a Riverside Health and Rehab, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of thirty (30) days' additional time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed April 7, 2025, the deadline for Appellant's initial brief and designation of matter is May 7, 2025. On account of work-related and other time commitments, Appellant respectfully requests this deadline be extended by 30 days. Respectfully, Appellant believes this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellant moves this Honorable Court to grant it an additional extension of 30 days' time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving its initial brief and designation of matter would be June 6, 2025, according to the undersigned's calculations. Further, Appellant respectfully requests the Court hold the present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

[Signature on next page]

[Signature page for Second Motion for Extension of Time to File/Serve Initial Brief of Appellant, Appellate No. 2025-000237]

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Stephen L. Brown (SC Bar No. 66468)
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Appellant.

PROOF OF SERVICE

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Attorneys for Appellant

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, hereby certify that Appellant's **SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANT** was served on Respondent on May 6, 2025, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

Samuel R. Clawson Jr., Esquire
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CLAWSON FARGNOLI UTSEY, LLC

Attorney for Respondent

Respectfully submitted,

CLEMENT RIVERS, LLP

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

Attorneys for Appellant

Charleston, South Carolina

May 6, 2025

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Tuesday, May 6, 2025 3:41 PM
To: 'Christy Fagnoli'; 'laura@cfulaw.com'; 'Sam Clawson'; 'Bert Utsey'
Cc: Hines, Russell; Justman, Aimee
Subject: Bryan v. THI; Appellate Case No. 2025-000237 (CR 230776)
Attachments: 2nd Motion for Extension - Initial Brief.pdf

Enclosed please find Appellant's Second Motion for Extension of Time to File/Serve their Initial 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.

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