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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Unpublished Opinion No. 2024-UP-401 (S.C. Ct.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 SECOND 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 May 5, 2025.

On account of work-related and other time commitments, the Respondent respectfully requests this deadline be extended by ten (10) additional 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) additional 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 15, 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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Attorney for Respondent

Aiken, South Carolina
May 2, 2025

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

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PROOF OF SERVICE

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Attorney for Respondent

I, A. Keith McAlister, Jr., of the Hawk Law Group, attorney for Respondent, hereby certify that the **MOTION FOR SECOND EXTENSION OF TIME TO FILE/SERVE RETURN TO PETITION FOR A WRIT OF CERTIORARI** was served on Petitioners on May 2, 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
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Attorneys for Petitioners

I also certify that Respondent's **MOTION FOR SECOND 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 May 2, 2025, via email (see attached) to ctappfilings@sccourts.org.

Respectfully submitted,

HAWK LAW GROUP

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May 2, 2025