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Jun 11 2025

SC Court of Appeals

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

Appeal from Orangeburg County
Court of Common Pleas

Maite Murphy, Circuit Court Judge

Case No. 2022-CP-38-00525

Beverly Vaughn,
as Personal Representative of the Estate of Loris Paris,

Respondent,

v.

Saint Matthews Healthcare, LLC; Melissa Kizer;
Melissa Davis; and Angela Smith Teliha,

Defendants,

Of which Saint Matthews Healthcare, LLC;
Melissa Kizer; and Melissa Davis, are the

Appellants.

**MOTION FOR EXTENSION OF TIME TO
FILE/SERVE INITIAL 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)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Appellants

COME NOW Appellants Saint Matthews Healthcare, LLC; Melissa Kizer; and Melissa Davis, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an extension of five (5) days' additional time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed May 13, 2025, the deadline for Appellants' initial brief and designation of matter is June 11, 2025. Appellants' counsel recognizes the notice in the Court's May 13, 2025 order that further extension of the initial brief/designation deadline would have to be occasioned by extraordinary circumstances. The present June 11th deadline falls during the week in which the primary author of Appellants' brief (Mr. Hines) is out of the state for a week-long family vacation. Mr. Hines had hoped to be able to complete the brief so that it would be filed/served by Today, Wednesday, June 11, 2025, but on account of work-related and other time commitments he was unable to do so, and he humbly asks the Court consider the circumstances (disruption to his normal work schedule) as sufficiently out of the ordinary to merit granting the dispensation requested herein, which he most respectfully submits is consistent with the interests of justice and will not unduly prejudice any other party.

WHEREFORE, Appellants move this Honorable Court to grant them an additional extension of 5 days' time to file/serve their 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 their initial brief and designation of matter would be June 18, 2025, according to the undersigned's calculations. Further, Appellants respectfully request the Court hold their present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

[signature on next page]

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines

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Attorneys for Appellants

Charleston, South Carolina

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PROOF OF SERVICE

CLEMENT RIVERS, LLP
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Attorneys for Appellants

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

Joshua P. Cantwell, Esquire
CANTWELL LAW FIRM, LLC
josh@cantwelllawfirm.org

Attorney 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

June 11, 2025

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Wednesday, June 11, 2025 12:54 PM
To: 'Josh Cantwell'
Cc: Justman, Aimee; Hines, Russell
Subject: Vaughn v. St. Matthews; Appellate Case No. 2025-000296 (CR 210705)
Attachments: 3rd Motion for Extension - Initial Brief.pdf

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

Thank you,

Pollyana Bell

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Russell G. Hines, Stephen A. Griffith, Jr.
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