

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

Appeal from Charleston County
Court of Common Pleas

J. Cordell Maddox Jr., Circuit Court Judge

Case No. 2022-CP-10-00483

Appellate No. 2025-000070

Fernesha Mazyck,
as Personal Representative of the Estate of Ida Braggs,

v.

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

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Jun 16 2025

SC Court of Appeals

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JUN 20 2025

SC Court of Appeals

Respondent,

Appellant.

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

Attorneys for Appellant

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

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 ten (10) days' additional time to file/serve its initial reply brief.

Presently, in accordance with Rule 208(a)(3), the deadline for Appellant's initial reply brief is June 16, 2025. On account of work-related and other time commitments, Appellant respectfully requests this deadline be extended by 10 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 a second extension of 10 days' time to file/serve its initial reply brief. With the extension requested herein, the new deadline for filing/serving its initial reply brief would be June 26, 2025, according to the undersigned's calculations. Further, Appellant respectfully requests the Court hold the present deadline in abeyance until it acts upon this motion.

[signature on next page]

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
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Attorneys for Appellant

Charleston, South Carolina

June 16, 2025

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SC Court of Appeals

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SC Court of Appeals

Case No. 2022-CP-10-00483

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as Personal Representative of the Estate of Ida Braggs,

Respondent,

v.

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

Appellant.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
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Attorneys for Appellant

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, hereby certify that Appellant's **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANT** was served on Respondent on June 16, 2025, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

Grahame E. Holmes, Esquire
PARKER LAW GROUP, LLP
gholmes@parkerlawgroupsc.com

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

June 16, 2025

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Monday, June 16, 2025 11:57 AM
To: Grahame Holmes; Jay Parker; Giselle Hayes
Cc: Hines, Russell; Justman, Aimee
Subject: Mazyck v. THI; Appellate Case No. 2025-000070 (CR 211023)
Attachments: Motion for Extension - Initial Reply Brief.pdf

Enclosed please find Appellant's Motion for Extension of Time to File/Serve their Initial Reply 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.
Commercial Litigation Practice Group
Phone: (843)720-5488 | Fax: (843)579-1369



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ATTORNEYS AT LAW

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Project Assistant

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June 16, 2025

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SC Court of Appeals

VIA US MAIL

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Fernesha Mazyck, as Personal Representative of The Estate of Ida Braggs v. THI
of South Carolina at Charleston, LLC d/b/a Riverside Health and Rehab
Appellate Case No.: 2025-000070
Case No.: 2022-CP-10-00483
YCR File: 14347-20211023

Dear Ms. Kitchings:

Enclosed please find our firm's check representing the filing fee for Appellant's Motion for Extension of Time to File/Serve their Initial Reply Brief, which was electronically filed on June 16, 2025, in the above-referenced matter.

With best wishes and kindest regards, I am

Sincerely,

CLEMENT RIVERS, LLP

Pollyana Bell
Project Assistant

/pbb
Enclosure(s)



CLEMENT RIVERS, LLP

P.O. Box 993
Charleston, SC 29402

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SC Court of Appeals

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
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