

**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,

**RECEIVED**

**Jun 26 2025**

SC Court of Appeals

**RECEIVED**

**JUL 01 2025**

SC Court of Appeals

105141

Respondent,

v.

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

Appellant.

**SECOND 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, by order of this Court filed June 17, 2025, the deadline for Appellant's initial reply brief is June 26, 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 July 7, 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)  
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*

Charleston, South Carolina

June 26, 2025

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

---

**RECEIVED**  
**Jun 26 2025**  
SC Court of Appeals

Appeal from Charleston County  
Court of Common Pleas

J. Cordell Maddox Jr., Circuit Court Judge

---

**RECEIVED**

Case No. 2022-CP-10-00483  
Appellate No. 2025-000070

---

**JUL 01 2025**  
SC Court of Appeals

Fernesha Mazyck,  
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  
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*

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 REPLY BRIEF OF APPELLANT** was served on Respondent on June 26, 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 26, 2025

**Bell, Pollyana (Polly)**


---

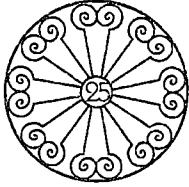
**From:** Bell, Pollyana (Polly)  
**Sent:** Thursday, June 26, 2025 10:18 AM  
**To:** Grahame Holmes; Jay Parker; Giselle Hayes  
**Cc:** Hines, Russell; Justman, Aimee  
**Subject:** Mazyck v. THI; Appellate Case No. 2025-000070 (CR 211023)  
**Attachments:** 2nd Motion for Extension - Initial Reply Brief .pdf

Enclosed please find Appellant's Second 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  
 **CLEMENT RIVERS, LLP**  
25 Calhoun Street • Suite 400 • Charleston, SC 29401  
ycrlaw.com



# CLEMENT RIVERS, LLP

ATTORNEYS AT LAW

Pollyana Bell  
Secretary

Direct Dial: (843) 720-5488

Direct Fax: (843) 579-1369

E-mail: pbell@yrcrlaw.com

**RECEIVED**

June 26, 2025

JUL 01 2025

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 Second Motion for Extension of Time to File/Serve their Initial Reply Brief, which was electronically filed on June 26, 2025, in the above-referenced matter.

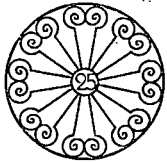
With best wishes and kindest regards, I am

Sincerely,

CLEMENT RIVERS, LLP

Pollyana Bell  
Secretary

/pbb  
Enclosure(s)



# CLEMENT RIVERS, LLP

P.O. Box 993  
Charleston, SC 29402

RGH  
20211023

CHARLESTON SC 294

27 JUN 2025 PM 1 L

quadiant

FIRST-CLASS MAIL

IMI

06/26/2025

**US POSTAGE** \$000.97<sup>0</sup>



ZIP 29401  
041M12254069

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

**RECEIVED**  
JUL 01 2025  
SC Court of Appeals

29211-162929

