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Aug 11 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
The Honorable Jocelyn Newman, Circuit Court Judge

Civil Action No.:2023CP4003086
Appeal Number: 2024-001802

Jennifer Murphy, as Personal Representative of the Estate of Phyllis Gee...Plaintiff/Appellant,

v.

All Seasons Healthcare, LLC, All Seasons Healthcare, Inc., and TWG Polo Road, LLC d/b/a
Mill Creek Manor, LLC f/k/a Amara Place at Columbia.....Defendants,

Of whom All Seasons Healthcare, Inc is.....Respondent.

**RESPONDENT’S MOTION FOR EXTENSION OF TIME TO FILE
RESPONDENTS’ FINAL BRIEF**

Respondent All Seasons Healthcare, Inc., hereby respectfully moves pursuant to Rules 240 and 263 of the South Carolina Appellate Court Rules¹ for an Order granting Respondents a thirty (30) day extension of time to file their final reply brief in response to Appellant’s Final Brief filed with the South Carolina Court of Appeals, on the following grounds:

Appellants filed and served their Final Brief on July 29, 2025, pursuant to an extension granted by this Court. Respondent requires additional time to submit their final reply brief, as Respondent had a partner leave the firm who took another attorney in the firm who was assisting

¹ Because this Motion contains a full explanation of its grounds, Respondents forego filing a supporting Memorandum, as such Memorandum would serve no useful purpose.

with this case. This unexpected move has created a number of unanticipated issues and tasks for the undersigned counsel that have been unexpected and are taking much more time than the undersigned counsel could have expected.

Because of the forgoing reasons, as well as the fact that counsel for Respondents has had a number of matters to attend to in other State and Federal cases, the undersigned counsel for Respondent requires additional time to complete Respondent's Final Response Brief in this matter.

Counsel for Respondent would respectfully request an additional ten (10) days from the present date in which to file a Final Response Brief. The extended deadline, therefore, would be August 11, 2025. No prior request for an extension on this deadline has been filed by this party.

Respectfully submitted,

/s/Julius W. McKay, II

Julius W. McKay, II

The McKay Firm, PA

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Attorney for Respondent

Columbia, South Carolina

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on **August 11, 2025**, a copy of the foregoing ***Motion for Extension of Time to File Respondent’s Final Response Brief*** was duly served on Appellant at jrutkoksi@kassellaw.com, tmcvey@kassellaw.com, and jkassel@kassellaw.com.