

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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Aug 14 2025

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

SC Court of Appeals

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 PERMISSION TO SERVE AND FILE FINAL BRIEF
OF RESPONDENT OUTSIDE OF TIME SET BY RULE 211 SCACR**

Respondent All Seasons Healthcare, Inc., hereby respectfully moves pursuant to the
correspondence of the Court filed on August 4, 2025, for permission to file Respondent’s Final
Brief outside of the deadline set forth by Rule 211 of the South Carolina Appellate Court Rules.
This Motion, submitted concurrently with the Respondent’s Final Brief, is made within the time
frame set forth in the Court’s correspondence.

[SIGNATURE BLOCK APPEARS ON FOLLOWING PAGE]

The undersigned Counsel for the Respondent, in compliance with the Court's instruction on August 4, 2025, respectfully requests that the Court permit the Respondent to file and serve the Respondent's Final Brief in this matter.

Respectfully submitted,

/s/Julius W. McKay, II

Julius W. McKay, II

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Attorney for Respondent

Columbia, South Carolina
August 14, 2025

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on **August 14, 2025**, a copy of the foregoing ***Motion for to File and Serve Final Brief of Respondent*** was duly served on Appellant at jrutkoksi@kassellaw.com, tmcvey@kassellaw.com, and jkassel@kassellaw.com.

s/Sherri Johnson

Sherri A. Johnson, Paralegal to:
Julius W. McKay, II
The McKay Firm, PA