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Sep 04 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 REPLY 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 ten (10) days' additional time to file/serve their initial reply brief.

Presently, in accordance with Rule 208(a)(3), the deadline for Appellants' initial reply brief is September 5, 2025. On account of work-related and other time commitments, Appellants respectfully request this deadline be extended by 10 days. Respectfully, Appellants believe this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondents.

WHEREFORE, Appellants move this Honorable Court to grant them an additional extension of 10 days' time to file/serve their initial reply brief. With the extension requested herein, the new deadline for filing/serving their initial reply brief would be September 15, 2025, according to the undersigned's calculations. Further, Appellants respectfully request the Court hold this present deadline in abeyance until it acts upon this motion.

20210705

[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 Appellants

Charleston, South Carolina

September 4, 2025

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Appellants.

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 REPLY BRIEF OF APPELLANTS** was served on Respondent on September 4, 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

September 4, 2025

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Thursday, September 4, 2025 3:29 PM
To: Josh Cantwell
Cc: Justman, Aimee; Hines, Russell
Subject: Vaughn v. St. Matthews; Appellate Case No. 2025-000296 (CR 210705)
Attachments: 1st Motion for Extension - Initial Reply Brief.pdf

Enclosed please find Appellants' 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.

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