

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM GREENVILLE COUNTY  
PERRY H. GRAVELY, CIRCUIT COURT JUDGE

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Appellate Case No. 2025-000366  
Civil Action No. 2022-CP-23-04055

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Stacey Grist as Agent under a Power of Attorney for  
Stanford W. Grist and as Trustee of the Second Amended  
Trust of Stanford W. Grist living Trust dated December 5, 2005,  
Stanford Grist Veterinary Services, LLC, Chestnut Ridge Farm, LLC,  
And Hilly Street, LLC,.....Appellant,

v.

Priscilla Mickie Grist, Caroline York Grist Lyon,  
Leyland H. Lyon, Jr., Jennifer Browning, Browning  
Geriatrics Consulting, LLC, Tracy Parson, Kiki’s Kare, LLC  
d/b/a Comfort Keepers, Erin Couchell Individually and as a  
member of Kiki’s Kare, Chris Couchell individually and as a  
member of Kiki’s Kare, LLC, and Kerry Burnett McCreary, Defendants,

Of which Jennifer Browning, Browning Geriatrics Consulting, LLC,  
Tracy Parsons, Kiki’s Kare d/b/a Comfort Keepers, Erin Couchell  
Individually and as a member of Kiki’s Kare, Chris Couchell  
Individually and as a member of Kiki’s Kare, LLC are the, ..... Respondents.

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**Motion for Extension of Time**

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Comes now Appellant Stacey Grist (“Appellant”) by and through undersigned counsel  
and respectfully moves this Court for an Order granting her ability to serve and file her Return to  
each of Respondents’ respective Initial Briefs outside the filing deadline set forth by Rule 210 of  
the South Carolina Appellate Court Rules. In support of this Motion, Appellant states as  
follows:

1. Pursuant to Rule 210, the deadline for Respondents' Initial Brief was September 8, 2025. Respondent Browning filed their Initial Brief on September 4, 2025, and Respondent Kiki's Kare filed their Initial Brief on September 6, 2025. Respondent Parsons filed her Initial Brief on September 8, 2025.
2. Under the applicable rules, Appellant's Reply Briefs are due September 15, and September 16, respectfully. Appellant respectfully requests an extension of fifteen (15) days from September 8, 2025, to file her Reply Briefs in response to all Initial Briefs filed by Respondents.
3. If granted, the requested extension would move the deadline for Appellant's Reply Briefs to September 23, 2025.
4. The undersigned has conferred with counsel for Respondents, who have indicated their consent to this Motion.

WHEREFORE, Appellant respectfully, requests this Court enter an Order granting her an extension of time until September 23, 2025, to file her Reply Brief(s).

Respectfully submitted

**TRULUCK THOMASON, LLC**

s/Kimberly T. Thomason

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Dated this 9<sup>th</sup> day of  
September, 2025

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member of Kiki's Kare, Chris Couchell individually and as a  
member of Kiki's Kare, LLC, and Kerry Burnett McCreary, Defendants,

Of which Jennifer Browning, Browning Geriatrics Consulting, LLC,  
Tracy Parsons, Kiki's Kare d/b/a Comfort Keepers, Erin Couchell  
Individually and as a member of Kiki's Kare, Chris Couchell  
Individually and as a member of Kiki's Kare, LLC are the, ..... Respondents.

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**Proof of Service**

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Comes now undersigned counsel, a member of this Court's bar, and states that they  
served the Motion for Extension of Time, and this proof of service, this 9<sup>th</sup> day of September,  
2025 via email on the following attorney's:

Fred W. "Trey" Suggs, III  
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Dated this 9<sup>th</sup> day of September, 2025.

**TRULUCK THOMASON, LLC**

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