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**Sep 25 2025**

**SC Court of Appeals**

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

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Appeal from Richland County  
Court of Common Pleas

Robert E. Hood, Circuit Court Judge

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Case No. 2023-CP-40-02608

Appeal No. 2025-001017

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Sallie Wilson  
as Guardian for Gladys Graham,

Respondent,

v.

Medical University Hospital Authority  
d/b/a MUSC Health Columbia Medical Center Northeast,  
Columbia AL Operations, LLC  
d/b/a Harmony Collection at Columbia (AL/MC),  
and Karen Bowman,

Defendants.

Of whom Columbia AL Operations, LLC  
d/b/a Harmony Collection at Columbia (AL/MC)  
and Karen Bowman are

Appellants.

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**SECOND MOTION FOR EXTENSION OF TIME TO  
FILE/SERVE INITIAL BRIEF OF APPELLANTS**

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CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis Jr. (SC Bar No. 12084)  
Matthew O. Riddle (SC Bar No. 76650)  
Russell G. Hines (SC Bar No. 72100)  
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(843) 720-5488

*Attorneys for Appellants*

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COME NOW Appellants, Columbia AL Operations, LLC d/b/a Harmony Collection at Columbia (AL/MC) and Karen Bowman, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an extension of thirty (30) days' additional time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed September 3, 2025, the deadline for Appellants' initial brief and designation of matter is September 25, 2025. On account of work-related and other time commitments, Appellants respectfully request this deadline be extended by 30 days. Respectfully, Appellants believe this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellants move this Honorable Court to grant them an additional extension of 30 days' time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving their initial brief and designation of matter would be October 27, 2025, according to the undersigned's calculations. Further, Appellants respectfully request the Court hold the present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

*[Signed on next page]*

*[Signature page for Second Motion for Extension of Time to File/Serve Initial Brief of Appellants, Appellate No. 2025-001017]*

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Stephen L. Brown (SC Bar No. 66468)  
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Charleston, South Carolina

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and Karen Bowman,

Defendants.

Of whom Columbia AL Operations, LLC  
d/b/a Harmony Collection at Columbia (AL/MC)  
and Karen Bowman are

Appellants.

---

**PROOF OF SERVICE**

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CLEMENT RIVERS, LLP  
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D. Jay Davis Jr. (SC Bar No. 12084)  
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*Attorneys for Appellants*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that Appellants' **SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANTS** was served on Respondent, as well as on Defendant Medical University Hospital Authority d/b/a MUSC Health Columbia Medical Center Northeast, on September 25, 2025, by emailing (see attached email) a copy of the same to their counsel of record:

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*d/b/a MUSC Health Columbia Medical Center*  
*Northeast*

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Russell G. Hines (SC Bar No. 72100)  
*Attorneys for Appellants*

Charleston, South Carolina

September 25, 2025

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Thursday, September 25, 2025 2:27 PM  
**To:** Nate Hughey; Stuart Hudson; Brad Banyas; jennifer@hugheylawfirm.com; Murrell Smith; Austin Reed  
**Cc:** Hines, Russell; Justman, Aimee  
**Subject:** Wilson v. Medical University Hospital Authority; Appellate Case No. 2025-001017 (CR 230633)  
**Attachments:** 2nd Motion for Extension - initial brief.pdf

Enclosed please find Appellants' Second Motion for Extension of Time to File/Serve their Initial 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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