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**Oct 02 2025**

**S.C. SUPREME COURT**

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

—————  
CERTIFIED QUESTION  
United States District Court, District of South Carolina  
Sherri A. Lydon, U.S. District Judge  
—————

Appellate Case No. 2025-001717  
—————

Jean Watkins, as Personal Representative of the Estate of Mildred Watkins, .....Plaintiff,

v.

Countrywood Nursing Center, LLC, Sterling Healthcare, Inc.,  
Guardian Resources, LLC, Robert W. Hagan, LaDonna Hagan,  
Chadwick S. Hagan, and Brooke Hagan McGee, .....Defendants.

—————  
**MOTION FOR EXTENSION**  
—————

The Plaintiff, Jean Watkins, moves for an extension of fifteen (15) days to file her brief in this matter. The present deadline to file Plaintiff’s brief is October 23, 2025. The grounds for this motion are that undersigned counsel is scheduled to be out of the country between October 11, 2025 and October 22, 2025 and has secured leave for the weeks of October 13, 2025 and October 20, 2025. Granting Plaintiff’s motion would extend the applicable deadline to November 7, 2025.

Plaintiff’s counsel have consulted with counsel for the Defendants and Defendants’ counsel consent to this motion.

Respectfully submitted,

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October 2, 2025  
Columbia, South Carolina