

RECEIVED

OCT 14 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,

/s/ Graham L. Newman
Graham L. Newman
CHAPPELL, CHAPPELL & NEWMAN
4500 Fort Jackson Boulevard
Suite 250

Columbia, South Carolina 29209
(803) 233-7050

Jennifer R. Purdy
PURDY LAW, LLC
828 Woodrow Street
Columbia, South Carolina 29205
(803) 999-5009

ATTORNEYS FOR PLAINTIFF

October 2, 2025
Columbia, South Carolina