

RECEIVED

Oct 27 2025

SC Court of Appeals

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

Appeal from Richland County
Court of Common Pleas

Robert E. Hood, Circuit Court Judge

Case No. 2023-CP-40-02608
Appeal No. 2025-001017

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.

**MOTION FOR EXTENSION OF TIME TO OCTOBER 29, 2025,
TO FILE/SERVE INITIAL BRIEF OF APPELLANTS**

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)
25 Calhoun Street, Suite 400
P.O. Box 993 (29402)
Charleston, South Carolina 29401
(843) 720-5488

Attorneys for Appellants

NOW COME 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 hereby move for an extension of two (2) days' additional time, i.e., to Wednesday, October 29, 2025, 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 30, 2025, the deadline for Appellants' initial brief and designation of matter is today, October 27, 2025. The undersigned does not make this motion lightly, but the fact is, on account of work-related and other time commitments, including the coincidence of deadlines in multiple matters on or about this date, the undersigned remains in need of a small amount of additional time to complete the Initial Brief of Appellants and designation and hopes the Court will deem the circumstances worthy of the relief requested herein, the undersigned humbly submitting that the grant of such relief is duly supported as an appropriately modest dispensation that is consistent with the interests of justice that will not result in any undue prejudice to Respondent.

WHEREFORE, Appellants move this Honorable Court to grant them an extension of two (2) days' additional time, i.e., to Wednesday, October 29, 2025, to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal. Further, Appellants respectfully request that the Court hold the present deadline in abeyance until it acts upon this motion.

<SIGNED ON THE FOLLOWING 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)
Matthew O. Riddle (SC Bar No. 76650)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
P.O. Box 993 (29402)
Charleston, South Carolina 29401
(843) 720-5488
Attorneys for Appellants

Charleston, South Carolina

October 27, 2025

RECEIVED

Oct 27 2025

SC Court of Appeals

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

Appeal from Richland County
Court of Common Pleas

Robert E. Hood, Circuit Court Judge

Case No. 2023-CP-40-02608
Appeal No. 2025-001017

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.

PROOF OF SERVICE

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)
25 Calhoun Street, Suite 400
P.O. Box 993 (29402)
Charleston, South Carolina 29401
(843) 720-5488

Attorneys for Appellants

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that the **MOTION FOR EXTENSION OF TIME TO OCTOBER 29, 2025, 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 October 27, 2025, by emailing (see attached email) a copy of the same to their counsel of record:

D. Nathan Hughey, Esquire
nate@hugheylawfirm.com
A. Stuart Hudson, Esquire
stuart@hugheylawfirm.com
Bradley H. Banyas, Esquire
brad@hugheylawfirm.com
HUGHEY LAW FIRM, LLC

-and-

Jordan C. Calloway, Esquire
jcalloway@mcgowanhood.com
MCGOWAN, HOOD, FELDER
& PHILLIPS, LLC
Attorneys for Respondent

G. Murrell Smith, Jr., Esquire
murrell@smithrobinsonlaw.com
Austin T. Reed, Esquire
austin.reed@smithrobinsonlaw.com
SMITH ROBINSON HOLLER DUBOSE
AND MORGAN, LLC

Attorneys for Defendant
Medical University Hospital Authority
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

October 27, 2025

Hines, Russell

From: Hines, Russell
Sent: Monday, October 27, 2025 9:20 PM
To: Nate Hughey (nate@hugheyfirm.com); Stuart Hudson (stuart@hugheyfirm.com); Brad Banyas (brad@hugheyfirm.com); 'Jordan Calloway'; Jordan Calloway (Jordan@mcgowanhood.com); Murrell Smith; Austin Reed
Cc: Brown, Stephen L.; Davis, Jay; Riddle, Matthew; Justman, Aimee; Bell, Pollyana (Polly); Peterson, Susan; Bohannon, Kiara
Subject: Wilson v. MUHA (2025-001017) -- Appellants' Motion for Extension to 10-29-25
Attachments: Wilson v. MUHA (2025-001017) -- Mot. for Ext. to 10-29-25.pdf

Attached for service in the above-referenced matter please find the **Motion for Extension of Time to October 29, 2025, to File/Serve Initial Brief of Appellants.**

Russell G. Hines
CLEMENT RIVERS, LLP
www.ycrlaw.com
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
Phone: (843) 720-5488
Fax: (843) 579-1327
Email: rhines@ycrlaw.com



CLEMENT RIVERS, LLP
25 Calhoun Street • Suite 400 • Charleston, SC 29401
ycrlaw.com