

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

Appeal from Kershaw County
Court of Common Pleas

Daniel Coble, Circuit Court Judge

Case No. 2023-CP-28-00524
Appellate Case No. 2025-001943

RECEIVED
Nov 20 2025
SC Court of Appeals

Lynn Marie Sanborn
as Personal Representative of the Estate of Shirley Mallory,

Respondent,

v.

Palmetto Springdale Operating, LLC, d/b/a Springdale Healthcare Center
and Ashley Lloyd,

Appellants.

**MOTION FOR EXTENSION OF TIME 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)
T. Ashton Phillips III (SC Bar No. 104227)
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

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

COME NOW Appellants, Palmetto Springdale Operating, LLC, d/b/a Springdale Healthcare Center and Ashley Lloyd, 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, in accordance with Rule 208(a)(1), the deadline for Appellants' initial brief and designation of matter is Friday, November 21, 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 December 22, 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 Motion for Extension of Time to File/Serve Initial Brief of Appellant,
Appellate No. 2025-001943*

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)
T. Ashton Phillips III (SC Bar No. 104227)
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

November 20, 2025

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

Appeal from Kershaw County
Court of Common Pleas
Daniel Coble, Circuit Court Judge

Case No. 2023-CP-28-00524
Appellate Case No. 2025-001943

RECEIVED
Nov 20 2025
SC Court of Appeals

Lynn Marie Sanborn
as Personal Representative of the Estate of Shirley Mallory,

Respondent,

v.

Palmetto Springdale Operating, LLC, d/b/a Springdale Healthcare Center
and Ashley Lloyd,

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)
T. Ashton Phillips III (SC Bar No. 104227)
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 Appellants' **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANTS** was served on Respondent on November 20, 2025, by emailing (see attached email) a copy of the same to her counsel of record:

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

Respectfully submitted,
CLEMENT RIVERS, LLP

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

Charleston, South Carolina

November 20, 2025

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Thursday, November 20, 2025 11:02 AM
To: 'Brad Banyas (brad@hugheylawfirm.com)'; 'Nate Hughey (nate@hugheylawfirm.com)'; 'Stuart Hudson (stuart@hugheylawfirm.com)'; 'sareeta@hugheylawfirm.com'; 'Jennifer@hugheylawfirm.com'; 'jwilson@hugheylawfirm.com'; 'Jordan Pace (jordan@hugheylawfirm.com)'
Cc: Hines, Russell; Justman, Aimee
Subject: Appeal 2025-001943 - Sanborn v. Palmetto Springdale Operating - CR220795
Attachments: Motion for Extension - Initial Brief.pdf

Enclosed please find Appellants' 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.
Commercial Litigation Practice Group
Phone:(843)720-5488 | Fax:(843)579-1369



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

RECEIVED

Nov 20 2025

SC Court of Appeals

MatterId: