

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

*2nd*  
*40079*

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

**RECEIVED**  
OCT 18 2013  
SC Court of Appeals

Marvin H. Dukes, III, Master-in-Equity

Case No. 2013-001808

Yvonne Carrie Pruett.....Respondent,

v.

Brookdale Senior Living, Inc. and Southern Assisted Living, LLC..... Appellants,

and

Sonia S. King..... Defendant.

**APPELLANTS' SECOND MOTION FOR A 30-DAY EXTENSION IN WHICH TO  
FILE INTIAL BRIEF AND DESIGNATION OF MATTER**

Appellants Brookdale Senior Living, Inc. and Southern Assisted Living, LLC move this Court for an extension on the following grounds:

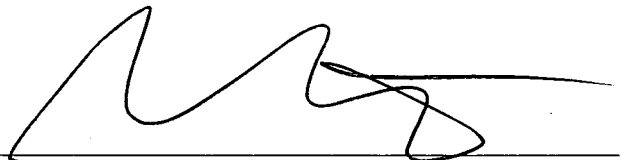
1. Appellants respectfully requests a 30-day extension in which to file their Initial Brief and Designation of Matter to be Included in the Record on Appeal. The grounds for this Motion are that Appellant's lawyers need additional time to finalize this brief.

2. Brookdale's counsel represents the State of South Carolina, DSS, the Judicial Department, and others in a contract controversy against a division of Hewlett Packard relating to the State's termination of the child-support

*ALB*  
*10-21*  
*due 4 30 = Nov.*

enforcement contract. Brookdale's counsel has been heavily involved in hearing preparation, motion practice, and witness preparation for the hearing that is scheduled to start October 21, 2013 and is expected to last three to four weeks. Brookdale's counsel needs additional time to finalize the brief.

Therefore, Appellants respectfully request a 30-day extension in which to file and serve its Initial Brief and Designation of Matter. The current deadline is October 21, 2013. With the proposed extension, the new deadline would be November 20, 2013.



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Manton M. Grier, Jr., SC Bar #70525  
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Attorneys for Appellants  
Brookdale Senior Living, Inc. and Southern  
Assisted Living, LLC

October 16, 2013

Columbia, South Carolina

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

RECEIVED  
OCT 13 2013  
SC Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Marvin H. Dukes, III, Master-in-Equity

Case No. 2011-CP-07-1700  
Appellate Case No. 2013-001808

Samuel H. Pruett, as Personal Representative for the Estate of  
Yvonne Carrie Pruett.....Respondent,

v.

Brookdale Senior Living, Inc. and Southern Assisted Living, LLC; Southern  
Assisted Living, LLC d/b/a Carolina House of Hilton Head; and Sonia S.  
Kings.....Defendants,

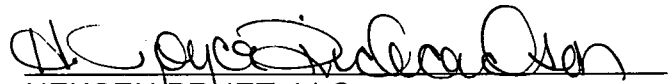
Of whom Brookdale Senior Living, Inc. and Southern Assisted Living, LLC d/b/a  
Carolina House of Hilton Head are the.....Appellants.

**PROOF OF SERVICE**

The undersigned certifies that a copy of the **Appellants' Second Motion For A 30-Day Extension In Which To File Initial Brief And Designation Of Matter** has been served upon counsel of record via electronic mail and by depositing a copy of the same, first-class postage prepaid in the United States Mail, on the 16<sup>th</sup> day of October, 2013, to the address shown below.

Susan Wall, Esquire  
McNAIR LAW FIRM, P.A.  
Post Office Box 1431  
Charleston, South Carolina 29402

Kelly M. Jolley, Esquire  
McNAIR LAW FIRM, P.A.  
Post Office Drawer 3  
Hilton Head Island, South Carolina 29938

  
NEXSEN PRUET, LLC

Columbia, South Carolina

NEXSEN | PRUET

October 16, 2013

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, South Carolina 29201

Manton M. Grier, Jr.  
Special Counsel  
Admitted in SC

RECEIVED  
OCT 16 2013  
SC Court of Appeals

Re: Yvonne Carrie Pruett v. Brookdale Senior Living, Inc., Southern Assisted Living, LLC and Sonia S. King/Case No. 2011-CP-07-1700 Appellate Case No. 2013-001808

Dear Ms. Kitchings:

Enclosed for filing with the Court is an original and seven copies of **Appellants' Second Motion For A 30-Day Extension In Which To File Initial Brief And Designation and Proof Of Service** in the above-referenced matter. Please return a copy, clocked-in, to me via our courier. I have enclosed my firm's check in the amount of \$25 for the filing fee.

By copy of this letter and as evidenced by the attached Proof Of Service, we are serving counsel of record with a copy of the above Motion.

Thank you for your assistance.

Very truly yours,



Manton M. Grier, Jr.

MMG/hjr

Enclosure

cc w/encl.: Kelly M. Jolley, Esquire (via electronic mail)  
Susan T. Wall, Esquire (via electronic mail)

- Charleston
- Charlotte
- Columbia**
- Greensboro
- Greenville
- Hilton Head
- Myrtle Beach
- Raleigh