

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

**RECEIVED**

**Dec 05 2025**

**SC 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  
FILE/SERVE INITIAL REPLY 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)  
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(843) 720-5488

*Attorneys for Appellants*

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

COME NOW 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 move for an extension of ten (10) days' additional time to file/serve their initial reply brief.

Presently, in accordance with Rule 208(a)(3), the deadline for Appellants' initial reply brief is December 8, 2025. On account of work-related and other time commitments, Appellants respectfully request this deadline be extended by 10 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 10 days' time to file/serve their initial reply brief. With the extension requested herein, the new deadline for filing/serving their initial reply brief would be December 18, 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 Reply Brief of Appellants, Appellate No. 2025-001017]*

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Stephen L. Brown (SC Bar No. 66468)  
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Charleston, South Carolina

December 5, 2025

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Defendants.

Of whom Columbia AL Operations, LLC  
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and Karen Bowman are

Appellants.

**PROOF OF SERVICE**

CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
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*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 REPLY 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 December 5, 2025, by emailing (see attached email) a copy of the same to their counsel of record:

D. Nathan Hughey, Esquire  
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*Attorneys for Defendant*  
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*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

December 5, 2025

**Bell, Pollyana (Polly)**

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**From:** Bell, Pollyana (Polly)  
**Sent:** Friday, December 5, 2025 11:13 AM  
**To:** 'Nate Hughey'; 'Stuart Hudson'; 'Brad Banyas'; 'jennifer@hugheyfirm.com'; 'Murrell Smith'; 'Austin Reed'  
**Cc:** Hines, Russell; Justman, Aimee  
**Subject:** Wilson v. Medical University Hospital Authority; Appellate Case No. 2025-001017 (CR 230633)  
**Attachments:** 1st Motion for Extension - Initial Reply Brief.pdf

Enclosed please find Appellants' Motion for Extension of Time to File/Serve their Initial Reply 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**  
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