

**RECEIVED**

**Dec 18 2025**

**SC Court of Appeals**

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

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Appeal from Dorchester County  
Court of Common Pleas

Maite Murphy, Circuit Court Judge

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Case No. 2024-CP-18-00671

Appeal No. 2025-002151

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Javan Ennis  
as Personal Representative of the Estate of Michael Ennis,

Respondent,

v.

Hallmark Longterm Care, LLC d/b/a Hallmark Healthcare Center  
and Kellie Hiers,

Appellants.

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**MOTION FOR EXTENSION OF TIME TO  
FILE/SERVE INITIAL BRIEF OF APPELLANTS**

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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  
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Charleston, South Carolina 29401  
(843) 720-5488

*Attorneys for Appellants*

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

COME NOW Appellants, Hallmark Longterm Care, LLC d/b/a Hallmark Healthcare Center and Kellie Hiers, 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 Thursday, December 18, 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 January 20, 2026, according to the undersigned's calculations. Further, Appellants respectfully request the Court hold the present 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 Appellants, Appellate No. 2025-002151]*

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Stephen L. Brown (SC Bar No. 66468)  
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Matthew O. Riddle (SC Bar No. 76650)  
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*Attorneys for Appellants*

Charleston, South Carolina

December 17, 2025

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Appeal from Dorchester County  
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Appellants.

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**PROOF OF SERVICE**

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CLEMENT RIVERS, LLP  
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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 BRIEF OF APPELLANTS** was served on Respondent on December 17, 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](mailto:nate@hugheylawfirm.com)  
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*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

December 17, 2025

## Justman, Aimee

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**From:** Justman, Aimee  
**Sent:** Thursday, December 18, 2025 2:20 PM  
**To:** Nate Hughey (nate@hugheylawfirm.com); Stuart Hudson (stuart@hugheylawfirm.com); Brad Banyas (brad@hugheylawfirm.com); Assistant to Nathan Hughey Jennifer Meader (jmeader@hugheylawfirm.com)  
**Cc:** Hines, Russell  
**Subject:** Appeal 2025-002151 - Ennis v. Hallmark Longterm Care - CR230780  
**Attachments:** Ennis Motion.pdf

Good afternoon,

Enclosed please find a Motion for service upon you in the above-referenced appeal.

Thank you,

*Aimee Justman*  
*Paralegal and Group Coordinator*  
*Commercial Litigation & Appellate Group*  
*Clement Rivers, LLP*  
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