

**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

RECEIVED

Dec 18 2025

SC Court of Appeals

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.

**SECOND 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)
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, 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, by order of this Court dated December 5, 2025, the deadline for Appellants' initial reply brief is December 18, 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 29, 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.

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

December 18, 2025

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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 Appellants' **SECOND 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 18, 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
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

December 18, 2025

Justman, Aimee

From: Justman, Aimee
Sent: Thursday, December 18, 2025 11:25 AM
To: 'nate@hugheylawfirm.com'; 'stuart@hugheylawfirm.com'; 'brad@hugheylawfirm.com'; 'murrell@smithrobinsonlaw.com'; 'austin.reed@smithrobinsonlaw.com'; jennifer@hugheylawfirm.com
Cc: Hines, Russell
Subject: Appeal 2025-001017 - Wilson v. Medical University Hospital - CR230633
Attachments: Wilson Motion.pdf

Enclosed for service on you, please find a Motion for Extension in the above-referenced matter.

Thank you,

Aimee Justman
Paralegal and Group Coordinator
Commercial Litigation & Appellate Group
Clement Rivers, LLP
Phone: (843) 720-5460
Fax: (843) 579-1385
MatterId:



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

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