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**Jan 02 2026**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

William C. McMaster, III, Circuit Court Judge

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Case No. 2025-CP-23-01759

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Kimberly Haag, Individually  
and as Personal Representative  
of the Estate of Raymond  
Zeigler,

Respondent,

v.

Carlyle Senior Care of Fountain Inn,  
LLC; Carlyle Senior Care Management  
Company, Inc.; New Day Health  
Ventures, LLC; LARK of Fountain Inn,  
LLC; Fountain Inn Healthcare, LLC  
d/b/a Fountain Inn Post Acute;  
Providence Group, Inc.; Providence  
Administrative Consulting Services,  
Inc.; PACS Group, Inc.; PACS Holdings,  
LLC; and 501 Gulliver Property, LLC,

Defendants,

of which

Carlyle Senior Care of Fountain Inn,  
LLC; Carlyle Senior Care Management  
Company, Inc.; New Day Health  
Ventures, LLC; and LARK of Fountain  
Inn, LLC are the

Appellants.

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APPELLANTS' MOTION FOR EXTENSION  
OF TIME TO FILE INITIAL BRIEF

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Pursuant to Rule 263(b) of the South Carolina Appellate Court Rules, Carlyle Senior Care of Fountain Inn, LLC; Carlyle Senior Care Management Company, Inc.; New Day Health Ventures, LLC; and LARK of Fountain Inn, LLC (collectively, "Appellants"), by and through their undersigned counsel, respectfully move the Court to extend the time for filing their initial brief and designation of matter to be included in the record on appeal by thirty (30) days. Appellants received

the transcript of proceeding on December 8, 2025, making their initial brief due January 7, 2026, pursuant to Rule 208(a)(1) of the South Carolina Appellate Court Rules. Appellants respectfully request that the deadline to file their initial brief and designation of matter to be included in the record on appeal be extended thirty (30) days, which would allow them through and including February 6, 2026, to file and serve the brief. No previous extensions have been requested by or granted to Appellants. Further, Co-Appellants Fountain Inn Healthcare, LLC d/b/a Fountain Inn Post Acute; Providence Group, Inc.; Providence Administrative Consulting Services, Inc.; PACS Group, Inc.; PACS Holdings, LLC; and 501 Gulliver Property, LLC, also requested an extension through February 6, 2026 which was granted and filed on December 30, 2025. Allowing this request will allow all appellants to file and serve their briefs and designation of matter using the same deadline, February 6, 2026.

January 2, 2026

**HALL BOOTH SMITH, P.C.**

*/s/ Ashley S. Heslop*

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PACS Group, Inc., PACS Holding, LLC,  
and 501 Gulliver Property, LLC*

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Kimberly Haag, Individually  
and as Personal Representative  
of the Estate of Raymond  
Zeigler, Respondent,

v.

Carlyle Senior Care of Fountain Inn,  
LLC; Carlyle Senior Care Management  
Company, Inc.; New Day Health  
Ventures, LLC; LARK of Fountain Inn,  
LLC; Fountain Inn Healthcare, LLC  
d/b/a Fountain Inn Post Acute;  
Providence Group, Inc.; Providence  
Administrative Consulting Services,  
Inc.; PACS Group, Inc.; PACS  
Holdings, LLC; and 501 Gulliver  
Property, LLC, Defendants,

of which

Carlyle Senior Care of Fountain Inn,  
LLC; Carlyle Senior Care Management  
Company, Inc.; New Day Health  
Ventures, LLC; and LARK of Fountain  
Inn, LLC are the Appellants.

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CERTIFICATE OF SERVICE

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I hereby certify that on this 2<sup>nd</sup> day of January 2026, a true and correct copy of the above and foregoing Appellants' Motion for Extension of Time to File Initial Brief was served upon counsel of record by email and US Mail to the following:

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PACS Group, Inc., PACS Holding, LLC,  
and 501 Gulliver Property, LLC*

January 2, 2026

**HALL BOOTH SMITH, P.C.**

*/s/ Ashley S. Heslop*

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January 2, 2026

**VIA EMAIL**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
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**RECEIVED**  
**Jan 02 2026**  
**SC Court of Appeals**

Re: Kimberly Haag, Individually and as Personal Representative of the Estate of  
Raymond Zeigler v. Carlyle Senior Care of Fountain Inn, LLC, et al.  
Civil Action No.: 2025-CP-23-01757 AND 2025-CP-23-01759  
Appeal Case No. 2025-002264

Dear Ms. Kitchings:

We filed our Notice of Appeal in this matter November 10, 2025 and are writing to respectfully request a thirty (30) day extension for filing Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal. We do not anticipate that we will be able to complete our Initial Brief and Designation by January 7, 2026, due to other deadlines and commitments. If granted, the new deadline would be Friday, February 6, 2026. A Motion for Extension of Time is attached. By copy of this letter to counsel of record we are notifying them of our request for extension. We are having a check in the amount of \$50 sent by Federal Express for the extension request.

Thank you for your consideration of this request.

With kind regards, I am

Very truly yours,

*/s/ Ashley S. Heslop*

Ashley S. Heslop

ASH/sec

Enclosures

cc: Matthew W. Christian, Esq.  
Nicholas Clarence Chapman Stewart, Esq.  
J. Bennett Crites, III, Esq.

MOUNT PLEASANT, SC