

**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

Sallie Wilson
as Guardian for Gladys Graham,

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Mar 02 2026
SC Court of Appeals

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 LEAVE TO FILE FINAL BRIEF OF APPELLANTS AND
FINAL REPLY BRIEF OF APPELLANTS OUT OF TIME**

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)
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Attorneys for Appellants

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 respectfully move this Honorable Court to accept Appellants' Final Brief, Final Reply Brief, and Certifications of both, all of which are conditionally filed contemporaneously herewith.

Appellants filed and served the Record on Appeal on February 5, 2026. Pursuant to Rule 211(a), SCACR, the deadline to file the Final Briefs ran on February 25, 2026. Due to inadvertence, the undersigned did not properly calendar the time to respond or otherwise move for an extension of time.

With apologies to the Court and opposing counsel for this oversight, the undersigned humbly submits that good cause exists to grant the relief requested herein, which relief, the undersigned submits, is in the interests of justice and will not cause any undue prejudice to Respondent. And the undersigned would assure the Court that the aforementioned oversight was simply the result of inadvertence and by no means reflective of any intentional disregard for the proper appellate process.

Wherefore, the undersigned hereby moves this Honorable Court to grant them leave to file/serve the Final Brief of Appellants, Certification for Final Brief of Appellants, Final Reply Brief of Appellants, and Certification for Final Reply Brief of Appellants and accept them as duly filed/served.

[signature on next page]

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
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March 2, 2026

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and Karen Bowman are

Appellants.

PROOF OF SERVICE

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 LEAVE TO FILE FINAL BRIEF OF APPELLANTS AND FINAL REPLY BRIEF OF APPELLANTS OUT OF TIME** was served on Respondent, as well as on Defendant Medical University Hospital Authority d/b/a MUSC Health Columbia Medical Center Northeast, on March 2, 2026, by emailing (see attached email) a copy of the same to their counsel of record:

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Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
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Charleston, South Carolina

March 2, 2026

Beach, Sarah

From: Beach, Sarah
Sent: Monday, March 2, 2026 1:29 PM
To: nate@hugheylawfirm.com; stuart@hugheylawfirm.com; brad@hugheylawfirm.com; murrell@smithrobinsonlaw.com; austin.reed@smithrobinsonlaw.com; jennifer@hugheylawfirm.com
Cc: Hines, Russell; Justman, Aimee
Subject: Appeal 2025-001017 - Wilson v. Medical University Hospital - CR230633
Attachments: Wilson Motion.pdf; Final Appellants Brief.pdf; Final Brief Cert.pdf; Final Reply Brief.pdf; Final Reply Cert.pdf

Good afternoon,

Attached for service on you, please find:

- Motion for leave
- Final Appellants Brief
- Certification for Final Appellant's Brief
- Final Reply Brief
- Certification for Final Reply Brief

Thank you.

Best,
Sarah Beach
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Secretary
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