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Mar 25 2026

SC Court of Appeals

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

Appeal from Dorchester County
Court of Common Pleas

Maite Murphy, Circuit Court Judge

Case No. 2024-CP-18-00671

Appeal No. 2025-002151

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.

**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, 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 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 March 26, 2026. 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 April 6, 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.

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
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Attorneys for Appellants

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PROOF OF SERVICE

CLEMENT RIVERS, LLP
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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' **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANTS** was served on Respondent on March 25, 2026, 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
A. Stuart Hudson, Esquire
stuart@hugheylawfirm.com
Bradley H. Banyas, Esquire
brad@hugheylawfirm.com
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

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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' **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANTS** was served on Respondent on March 25, 2026, 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
A. Stuart Hudson, Esquire
stuart@hugheylawfirm.com
Bradley H. Banyas, Esquire
brad@hugheylawfirm.com
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

March 25, 2026

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Beach, Sarah

SC Court of Appeals

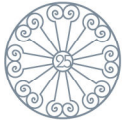
From: Beach, Sarah
Sent: Wednesday, March 25, 2026 3:29 PM
To: 'nate@hugheylawfirm.com'; 'stuart@hugheylawfirm.com'; 'brad@hugheylawfirm.com'; 'sareeta@hugheylawfirm.com'; 'Assistant to Nathan Hughey Jennifer Meader (jmeader@hugheylawfirm.com)'
Cc: Brown, Stephen L.; Hines, Russell; Justman, Aimee
Subject: Appeal 2025-002151 - Ennis v. Hallmark Longterm Care - Motion for Extension
Attachments: Ennis 2025-002151.pdf

Good afternoon,

Attached for service in the above-referenced matter, please find a Motion for Extension of Time to File/Serve Initial Reply Brief of Appellants.

Sarah Beach
Commercial Litigation
Secretary
sbeach@ycrlaw.com

Phone: 843-720-5488 Fax: 843-579-1369



CLEMENT RIVERS, LLP

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