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Apr 02 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas  
William C. McMaster, III, Circuit Court Judge

Appellate Case No. 2025-002264  
Case No. 2025-CP-23-01757  
Case No. 2025-CP-23-01759

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,..... Appellants.

APPELLANTS' JOINT MOTION FOR  
EXTENSION OF TIME TO FILE REPLY BRIEFS  
AND ANY SUPPLEMENTAL DESIGNATION

Pursuant to Rule 263(b) of the South Carolina Appellate Court Rules, 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; 501 Gulliver Property, LLC; 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, jointly move the Court to **extend the time for filing their reply briefs and any supplemental designation of matter** to be included in the record on appeal.

Appellants jointly request a ten (10) day extension of this deadline on account of work-related and other time commitments. According to Rule 208(a)(3), Appellants' reply brief and any supplemental designation are currently due on or before Thursday, April 9, 2026.

No previous extension has been requested by or granted to Appellants. If the Court grants this request for an extension, the new deadline for Appellants' reply briefs and any supplemental designation will be Monday, April 20, 2026.

Additionally, Appellants' check for the filing fee of \$50.00 is being mailed to the Court. All counsel of record of this request.

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

s/ Ashley S. Heslop  
Ashley S. Heslop  
SC Bar No. 71148  
Caroline K. Buchanan  
SC Bar No. 105244  
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*Attorneys for Appellants Carlyle Senior Care of Fountain Inn, LLC; Carlyle Senior Care Management Company, Inc.; New Day Health Ventures, LLC; and LARK of Fountain Inn, LLC*

**BURR & FORMAN LLP**

s/ Nicholas C.C. Stewart  
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SC Bar No. 71695  
Daniel S. "Chip" McQueeney, Jr.  
SC Bar No. 101250  
Nicholas C.C. Stewart  
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*Attorneys for 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*

April 2, 2026  
Charleston, South Carolina

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Personal Representative of the Estate  
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v.

Carlyle Senior Care of Fountain Inn,  
LLC; Carlyle Senior Care Management  
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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,..... Appellants.

PROOF OF SERVICE

Pursuant to Rule 262(c)(3), SCACR, and Order No. 2024-04-24-01(d)(1), I, Cameron Tabrizian, of Burr & Forman, LLP, attorneys for – 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 – hereby certify that I have served the Appellants’ Joint Request for a First Extension to File Appellants’ **Reply Brief and any supplemental designation**, by electronic mail, on all counsel of record utilizing counsels’ primary email addresses listed in the Attorney Information System, on April 2, 2026, as follows:

Matthew W. Christian, S.C. Bar No. 70516  
Post Office Box 332  
Greenville, South Carolina 29602  
(864) 232-7363  
mchristian@cclawfirm.com  
*Attorney for Respondent*

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

A copy of that electronic mail is attached to this proof of service as Exhibit A.

BURR & FORMAN, LLP

s/ Cameron Tabrizian  
Cameron Tabrizian  
S.C. Bar No. 106448  
Email: ctabrizian@burr.com

*Attorneys for 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*

April 2, 2026  
Charleston, South Carolina

# EXHIBIT A

**Tabrizian, Cameron**

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**From:** Tabrizian, Cameron  
**Sent:** Thursday, April 2, 2026 2:51 PM  
**To:** 'mchristian@cclawfirm.com'  
**Cc:** 'aheslop@hallboothsmith.com'; 'cbuchanan@hallboothsmith.com';  
'mwaters@hallboothsmith.com'; 'ajohnson@cclawfirm.com'; 'Susan Creel'; Crites, J.  
Bennett; Stewart, Nick; McQueeney, Chip; Wilson, Jenna; Price, Wendy  
**Subject:** RE: Kimberly Haag v. Fountain Inn Healthcare, LLC (2025-002264)  
**Attachments:** DRAFT Appellants' First Request for Extension for Reply Brief and Supplemental Designation(66752785.1).pdf

Good afternoon,

For service upon you, please find attached to this email Appellants' First Request for Extension of Time to File/Serve Appellants' Reply Briefs and Any Supplemental Designation of Matter for the above-titled appeal. The attached is in .pdf format.

Thanks very much, and all the best.

Sincerely,  
Cameron Tabrizian  
SC Bar No. 106448

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**Apr 02 2026**

**SC Court of Appeals**



Nicholas C.C. Stewart  
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SC Court of Appeals

115 Fairchild Street  
Suite 200  
Daniel Island, SC 29492

Office (843) 972-6177

BURR.COM

April 2, 2026

**Via EMAIL AND U.S. MAIL**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: Kimberly Haag, Individually and as Personal representative of the Estate of Raymond Zeigler v. Fountain Inn Healthcare, LLC et al  
Appeal Case No.: 2025-002264  
Civil Action No.: 2025-CP-23-01757 and 2025-CP-23-01759  
Burr File No.: 0051272.0000046

Dear Ms. Kitchings,

Please be advised that I represent 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 in the above-titled appeal.

Enclosed, please find the \$50.00 filing fee for the Appellants' Joint First Request for an Extension to File Reply Briefs and/or Supplemental Designations, which all Appellants filed with the Court on April 2, 2026.

All counsel of record have been provided a copy of this letter by email upon mailing.

Thank you for your careful attention to this matter. Please let me know if you have any questions or concerns.

Sincerely,

**Burr & Forman LLP**

Nicholas C.C. Stewart