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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
Appellate Case 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.

**APPELLANTS' MOTION FOR LEAVE TO FILE/SERVE
INITIAL REPLY BRIEF OF APPELLANTS OUT OF TIME**

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Attorneys for Appellants

NOW COME Appellants, Hallmark Longterm Care, LLC d/b/a Hallmark Healthcare Center and Kellie Hiers, by and through their undersigned counsel, pursuant to the Court's letter of April 13, 2026, and Rule 263(b), SCACR, and hereby move for leave to file/serve out of time the Initial Reply Brief of Appellants conditionally filed/served contemporaneously herewith and for the same to be accepted as duly filed and served.

By order filed March 26, 2026, the Court granted Appellants' first motion for an extension of time to file/serve the Initial Reply Brief of Appellants, extending the deadline to April 6, 2026. On April 13, 2026, the Court wrote Appellants' counsel advising that, within ten days, Appellants must serve and file the Initial Reply Brief of Appellants, along with a motion requesting permission to serve and file the same outside of the filing deadlines set by Rule 208, SCACR, and the Court's order of March 26, 2026.

Most respectfully, and with apologies to the Court and opposing counsel for the inadvertence that necessitated the instant motion, the undersigned submits that there is good cause to grant the motion as it is timely made within 10-day period specified in the Court's letter of April 13, 2026, accompanied by the Initial Reply Brief of Appellants (as directed in the Court's letter), and the grant of the relief requested herein is in furtherance of the interests of justice and will not unduly prejudice Respondent.

WHEREFORE, Appellants ask that this Honorable Court grant them leave to file/serve out of time the Initial Reply Brief of Appellants conditionally filed/served contemporaneously herewith and accept the same as duly filed and served.

<SIGNED ON THE FOLLOWING PAGE>

Respectfully submitted,
CLEMENT RIVERS, LLP

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