

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

Appeal from Dorchester County
Court of Common Pleas

Heath P. Taylor, Circuit Court Judge

Case No. 2025-CP-18-00231

Michael Brown,
as Personal Representative of
the Estate of James Brown,

Respondent,

v.

Hallmark Long Term Care, LLC
d/b/a Hallmark Healthcare Center,

Appellant.

**MOTION FOR EXTENSION OF TIME TO
FILE/SERVE INITIAL BRIEF OF APPELLANT**

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
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Matthew O. Riddle (SC Bar No. 76650)
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Attorneys for Appellant

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SC Court of Appeals

COMES NOW Appellant, Hallmark Long Term Care, LLC d/b/a Hallmark Healthcare Center, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of thirty (30) days' additional time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, in accordance with Rule 208(a)(1), the deadline for Appellant's initial brief and designation of matter is today, September 10, 2026. On account of work-related and other time commitments, Appellant respectfully requests this deadline be extended by 30 days. Respectfully, Appellant believes this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellant moves this Honorable Court to grant it an additional extension of 30 days' time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving its initial brief and designation of matter would be October 12, 2026, according to the undersigned's calculations. Further, Appellant respectfully requests the Court hold the present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
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September 9, 2026

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PROOF OF SERVICE

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Attorneys for Appellant

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, hereby certify that, on September 9, 2026, Appellant's **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANT** was served on Respondent by emailing (see attached email) a copy of the same to his counsel of record:

PARKER LAW GROUP, LLP
Grahame E. Holmes, Esquire
gholmes@parkerlawgroupsc.com
John E. Parker, Jr., Esquire
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Attorneys for Respondent

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines (SC Bar No. 72100)
Attorneys for Appellant

Charleston, South Carolina

September 9, 2026

Justman, Aimee

From: Justman, Aimee
Sent: Wednesday, September 9, 2026 12:37 PM
To: 'jayparker@parkerlawgroupsc.com'; 'ghayes@parkerlawgroupsc.com';
'AFelix@parkerlawgroupsc.com'; 'gholmes@parkerlawgroupsc.com'
Cc: Brown, Stephen L.; Davis, Jay; Riddle, Matthew; Hines, Russell
Subject: Appeal 2026-001268 – Brown v. Hallmark – CR241014 – motion for extension
Attachments: Brown Motion.pdf

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

Thank you,

Aimee Justman
Paralegal and Group Coordinator
Commercial Litigation & Appellate Group
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