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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

Heath P. Taylor, Circuit Court Judge

Case No. 2025-CP-18-00231
Appeal 2026-001268

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.

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

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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(843) 720-5488

Attorneys for Appellant

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 a second 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, by order of this Court filed September 21, 2026, the deadline for Appellant's initial brief and designation of matter is October 12, 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 November 12, 2026,[1] according to the undersigned's calculations. Further, Appellant respectfully requests the Court hold the present deadline in abeyance until it acts upon this motion.

[*signature on next page*]

[1] Calculating the 30-day period from October 12, 2026, it runs until Thursday, November 12, 2026 because the 30th day is Wednesday, November 11, 2026, which is a federal holiday. *See* Rule 263(a), SCACR.

[*Signature page for Second Motion for Extension of Time to File/Serve Initial Brief of Appellant Appeal 2026-001268*]

Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/Russell G. Hines

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Attorneys for Appellant

Charleston, South Carolina

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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 October 9, 2026, Appellant's **SECOND 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
jayparker@parkerlawgroupsc.com

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

October 9, 2026

Justman, Aimee

From: Justman, Aimee
Sent: Friday, October 9, 2026 10:05 AM
To: 'jayparker@parkerlawgroupsc.com'; 'ghayes@parkerlawgroupsc.com'; 'gholmes@parkerlawgroupsc.com'
Cc: Hines, Russell; Davis, Jay; Riddle, Matthew; Brown, Stephen L.
Subject: Appeal 2026-001268 – Brown v. Hallmark – CR241014 – Motion
Attachments: Brown - Motion.pdf

Attached for service on you in the above-referenced matter, please find a Second 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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