BURR & FORMAN

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RECEIVED
Oct 22 2026
SC Court of Appeals

115 Fairchild Street
Suite 200
Daniel Island, SC 29492

Office (843) 972-6177

BURR.COM

October 22, 2026

VIA EMAIL

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 (Consolidated)
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 ("Providence Appellants") in the above captioned appeal, and Ashley Heslop, Esq. and Caroline Buchanan Esq. are counsel for Appellants Carlyle Senior Care of Fountain Inn, LLC; Carlyle Senior Care Management Company, Inc.; New Day Health Ventures, LLC; LARK of Fountain Inn, LLC ("Carlyle Appellants") (collectively "Appellants").

Currently, by Order of the Court, Appellants' Appealability Memorandum is due on or before Monday, November 2, 2026.

Appellants respectfully request a ten (10) day extension of this deadline on account of work-related and other time commitments. No previous extension has been requested by or granted to Appellants. By my calculation, if the Court grants this request for an extension, the new deadline for Appellants' Appealability Memorandum will be Thursday, November 12, 2026.

Additionally, Appellants check for the filing fee of $50.00 is being hand delivered to the Court. By copy of this letter, I am advising all counsel of record of this request.

Your courtesies and consideration of this matter are greatly appreciated.

With best wishes and kindest regards, I am,

Sincerely,

Burr & Forman LLP

Nicholas C.C. Stewart

NCCS/cat

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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.

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 Letter Requesting a First Extension to File their Appealability Memorandum, by electronic mail, on all counsel of record utilizing counsels' primary email addresses listed in the Attorney Information System, on October 22, 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

Jordan C. Calloway, Esq.
McGowan, Hood, Felder & Phillips, LLC
1539 Health Care Drive
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Attorney for Respondent

Ashley S. Heslop, S.C. Bar No. 71148
Caroline K. Buchanan, S.C. Bar No. 105244
111 Coleman Boulevard, Suite 301
Mt. Pleasant, SC 29464
(843) 720-3460
aheslop@hallboothsmith.com
cbuchanan@hallboothsmith.com
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.

[SIGNATURE ON FOLLOWING PAGE]

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

October 22, 2026
Charleston, South Carolina

EXHIBIT A

RECEIVED
Oct 22 2026
SC Court of Appeals

Tabrizian, Cameron

From: Tabrizian, Cameron
Sent: Thursday, October 22, 2026 2:59 PM
To: 'Matt Christian'; 'jcalloway@mcgowanhood.com'
Cc: 'Monica D. Waters'; 'Amanda Johnson'; Crites, J. Bennett; Stewart, Nick; McQueeney, Chip; 'Caroline Buchanan'; Ashley Heslop; Laura Lee Andrews; Price, Wendy
Subject: RE: Kimberly Haag v. Fountain Inn Healthcare, LLC (2025-002264)
Attachments: Appellants' First Request for Extension for Filing Appealability Mem(74374628.1) (74383742.1).pdf

Good afternoon,

For service upon you, please find attached to this email Appellants' First Request for Extension to File their Appealability Memorandum for and concerning the above-titled appeal. The attached is in .pdf format.

Thank you very much.

Sincerely,
Cameron Tabrizian
SC Bar No. 106448

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VIA EMAIL AND HAND DELIVERY

The Honorable Jenny Abbott Kitchings
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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 (Consolidated)
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 ("Appellants") in the above-titled appeal. Enclosed, please find the $50.00 filing fee for the Appellants' First Request for an Extension to File their Appealability Memorandum, which Appellants filed with the Court on October 22, 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.

With best wishes and kindest regards, I am,

Sincerely,

Burr & Forman LLP

Nicholas C.C. Stewart