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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE ADMINISTRATIVE LAW COURT
The Honorable Deborah Brooks Durden, Administrative Law Judge

RECEIVED
OCT 13 2015
SC Court of Appeals

Appellate Case No. 2015-001986

Countrywood Nursing, LLC, Appellant,

v.

South Carolina Department of Health and Human Services, Respondent.

MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

Appellant requests a thirty (30) day extension of time to file its Initial Brief in this case pursuant to Rule 208 and Rule 240 of the South Carolina Appellate Court Rules. Numerous other court conflicts, deadlines and work obligations for Appellant's undersigned counsel prevent completion of the Initial Brief within the current deadline. This thirty day extension will allow Appellant time needed to complete the Initial Brief. This is Appellant's first request for an extension of time. No prejudice will be caused to any party by this additional extension.

Currently, the Initial Brief is due for filing on October 19, 2015, per Rule 208, SCACR. With the additional thirty-day extension, the deadline would be November 18. Counsel for Appellant has spoken to Counsel for the South Carolina Department of Health and Human Services and opposing counsel has consented to this motion for extension of time.

Appellant requests that the current deadline be held in abeyance while the Court considers this request.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By:  _____

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Oct. 13, 2015

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The Honorable Deborah Brooks Durden, Administrative Law Judge

Docket No. 15-ALJ-08-0014-AP

Countrywood Nursing, LLC

Appellant,

v.

South Carolina Department of Health and Human Services.....

Respondent.

CERTIFICATE OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Countrywood Nursing, LLC, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings: Motion for Extension of Time to File Initial Brief

Counsel Served: W. Allen Nickles, III, Esq.
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Myriam Brown
Myriam Brown, Administrative Assistant

10/13, 2015

Nelson Mullins

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October 13, 2015

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SC Court of Appeals

Hand Delivered

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

RE: Countrywood Nursing, LLC vs. SCDHHS
Case No. 2015-001986
Our File No. 39092/09002

Dear Ms. Kitchings:

I am enclosing an original and seven (7) copies of Appellant's Motion for Extension of Time to File Initial Brief. Please file stamp a copy and return to our office with our courier.

By copy of this letter, I am serving opposing counsel with a copy of the same. Please let us know if you need anything further.

Very truly yours,



Daniel J. Westbrook

DJW:myb

Encls.

cc: W. Allen Nickles, III, Esq. (w/encls)