

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

RECEIVED
OCT 03 2016
SC Court of Appeals

Case No. 2016-001732

White Oak Manor, Inc.; White Oak Management, Inc.; and White Oak Manor-Spartanburg, Inc.
d/b/a White Oak of Spartanburg, Appellants,

v.

Hilda Stott, individually and as Personal Representative of the Estate of Jolly P. Davis, deceased,
and as Personal Representative of the Statutory Beneficiaries, Respondents.

**MOTION TO EXTEND TIME TO FILE INITIAL BRIEF AND DESIGNATION OF
MATTER TO BE INCLUDED IN RECORD ON APPEAL**

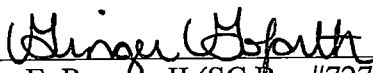
Appellants White Oak Manor, Inc.; White Oak Management, Inc.; and White Oak Manor-Spartanburg, Inc. d/b/a White Oak of Spartanburg hereby move the Court of Appeals pursuant to Rule 240, SCACR for an Order extending Appellants' time to file the Initial Brief and Designation of Matter to be Included in Record on Appeal for 30 days from the current due date. Appellants

have calculated the current due date as October 3, 2016. Appellants therefore request an extension of time to file these pleadings until November 2, 2016.

Appellants require this additional time to thoroughly and adequately prepare their brief and designation, particularly in light of recent administrative determinations that could potentially affect the arguments in this case. Appellants do not interpose this request for delay, and Respondent will incur no prejudice. Appellants request that all deadlines be held in abeyance pending the Court's ruling on this motion.

Respectfully submitted,

THE WARD LAW FIRM, P.A.
Attorneys for Appellants



John E. Rogers, II (SC Bar #72779)
Ginger D. Goforth (SC Bar # 6904)
P.O. Box 5663
Spartanburg, SC 29304
(864) 591-2366
(864) 585-3090 (fax)
Email: jrogers@wardfirm.com
Email: ggoforth@wardfirm.com

September 29, 2016

Other Counsel of Record:

POLIAKOFF & ASSOCIATES, P.A.
Gary W. Poliakoff
Raymond P. Mullman, Jr.
215 Magnolia Street
P.O. Box 1571
Spartanburg, SC 29304
(864) 582-5472

THE WARD LAW FIRM, P.A.

ATTORNEYS AT LAW
POST OFFICE BOX 5663
SPARTANBURG, SOUTH CAROLINA 29304

JAMES W. HUDGENS ■
GENE ADAMS ◆
H. SPENCER KING ◆
ROBERT E. DAVIS*
JASON M. IMHOFF
JOHN E. ROGERS, II*
GINGER D. GOFORTH
C. REED TEAGUE
CHAD M. GRAHAM

■ Retired
◆ Certified Mediator
* ALSO MEMBER NORTH CAROLINA BAR

RUFUS M. WARD (1908-1988)
L. PAUL BARNES (1931-1986)

233 SOUTH PINE STREET
SPARTANBURG, S.C. 29302

RECEIVED

OCT 03 2016

SC Court of Appeals

FAX. No. (864) 585-3090

E-mail: GGoforth@wardfirm.com

Direct No. 864-591-2344

September 29, 2016


The Honorable Jenny Abbott Kitchings
Court of Appeals Clerk of Court
PO Box 11629
Columbia, SC 29211

Re: White Oak Manor, Inc., White Oak Management, Inc., and White Oak Manor-Spartanburg, Inc., d/b/a White Oak of Spartanburg, Appellants, v. Hilda Stott, individually and as personal representative of the Estate of Jolly P. Davis, Respondents.

Dear Ms. Kitchings:

Enclosed please find one (1) original and seven (7) copies of Appellants, White Oak Manor, Inc., White Oak Management, Inc., and White Oak Manor-Spartanburg, Inc., d/b/a White Oak of Spartanburg's Motion to Extend Time to File Initial Brief and Designation of Matter, along with our firm's check in the amount of \$25.00 for the filing fees associated with this motion. Please file the original and return a clocked copy to me in the postage-paid, self-addressed envelope provided.

Sincerely,



Ginger D. Goforth

GDG/prm

cc: Raymond P. Mullman, Jr., Esquire
Gary W. Poliakoff, Esquire

Enclosures

81142

THE WARD LAW FIRM, P.A.

ATTORNEYS AT LAW
POST OFFICE BOX 5663
SPARTANBURG, SOUTH CAROLINA 29304

JAMES W. HUDGENS ■
GENE ADAMS ◆
H. SPENCER KING ◆
ROBERT E. DAVIS *
JASON M. IMHOFF
JOHN E. ROGERS, II *
GINGER D. GOFORTH
C. REED TEAGUE
CHAD M. GRAHAM

RUFUS M. WARD (1908-1988)
L. PAUL BARNES (1931-1986)

233 SOUTH PINE STREET
SPARTANBURG, S.C. 29302

FAX. No. (864) 585-3090

■ Retired
◆ Certified Mediator
* ALSO MEMBER NORTH CAROLINA BAR

E-mail: GGoforth@wardfirm.com

Direct No. 864-591-2344

September 30, 2016

RECEIVED

OCT 03 2016

SC Court of Appeals

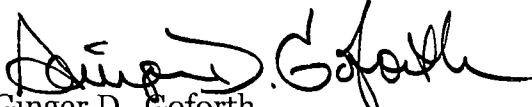
The Honorable Jenny Abbott Kitchings
Court of Appeals Clerk of Court
PO Box 11629
Columbia, SC 29211

**Re: White Oak Manor, Inc., White Oak Management, Inc., and
White Oak Manor-Spartanburg, Inc., d/b/a White Oak of
Spartanburg, Appellants, v. Hilda Stott, individually and as
personal representative of the Estate of Jolly P. Davis,
Respondents.**

Dear Ms. Kitchings:

Enclosed please find our \$25 filing fee for the Motion to Extend Time to File Brief and Designation of Matter in the above-captioned case. The Motion was mailed under separate cover.

Sincerely,


Ginger D. Goforth

GDG/prm

Enclosures

J

THE WARD LAW FIRM, P.A.

ATTORNEYS AT LAW
233 SOUTH PINE STREET
P.O. BOX 5663

SPARTANBURG, SOUTH CAROLINA 29304

NEOPOST

FIRST-CLASS MAIL

09/29/2016

US POSTAGE \$001.09⁵



ZIP 29302
041L11259525

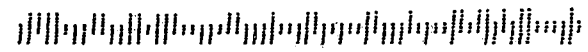
RECEIVED

OCT 03 2016

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Court of Appeals Clerk of Court
PO Box 11629
Columbia, SC 29211

292111629 8012



THE WARD LAW FIRM, P.A.

ATTORNEYS AT LAW
233 SOUTH PINE STREET
P.O. BOX 5663

SPARTANBURG, SOUTH CAROLINA 29304

GREENVILLE

SC 296

30 SEP '16

PM 1 L

NEOPOST

FIRST-CLASS MAIL

09/30/2016

US POSTAGE \$000.46



ZIP 29302
041L11259525

RECEIVED

OCT 03 2016

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Court of Appeals Clerk of Court
PO Box 11629
Columbia, SC 29211

29211-162929

