

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

Richland County Case No. 2016-CP-40-04463  
Court of Appeals Case No. 2018-000924

**RECEIVED**  
AUG 02 2018  
SC Court of Appeals

Jean Watkins, as Personal Representative  
of the Estate of Mildred Watkins,

Respondent,

v.

Sterling Healthcare, Inc., Country Wood  
Nursing Center, LLC, and Guardian  
Resources, LLC,

Appellants.

**MOTION FOR AN EXTENSION OF TIME**

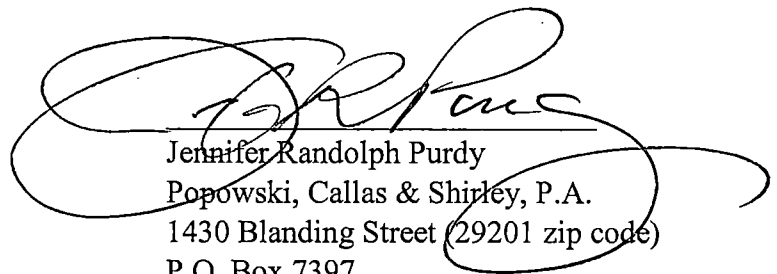
Pursuant to Rule 240 and Rule 263 of the South Carolina Appellate Court Rules,  
Respondent, Jean Watkins, as Personal Representative of the Estate of Mildred Watkins,  
("Respondent"), respectfully requests a thirty day (30) extension of time to file the Respondent's

Initial Brief and Designation of Matter to be Included in the Record on Appeal. This is Respondent's first request for an extension of time.

The Initial Brief of the Appellants was mailed from the office of Appellants' counsel in Atlanta, Georgia on July 18, 2018. Respondent's counsel received the Appellants' Brief on July 23, 2018. Respondent's brief is due on August 16, 2018. Respondent's counsel has long-standing out of state vacation plans from August 3, 2018 until August 11, 2018. Respondent's counsel has been granted protection for this period of time by the circuit courts of the counties in which she has pending cases, including the circuit court of Richland County, the venue from which this appeal arises. Despite due diligence in working toward the timely completion of the Brief and Designation, the Respondent is in need of additional time to complete these filings.

Therefore, Respondent respectfully requests that the Court enter an Order extending the deadline for the Respondent's Initial Brief and Designation of Matter until September 14, 2018. Respondent requests that the current deadline be held in abeyance while the Court considers this request.

Respectfully submitted,



Jennifer Randolph Purdy  
Popowski, Callas & Shirley, P.A.  
1430 Blanding Street (29201 zip code)  
P.O. Box 7397  
Columbia, South Carolina 29202  
(803) 799-2100  
Attorney for Respondent

August 2, 2018

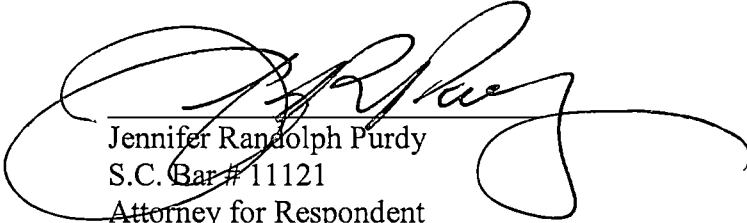
**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the foregoing MOTION FOR AN EXTENSION OF TIME upon all counsel of record by mailing the same via the United States Postal Service with sufficient postage in a properly addressed envelope to:

Leah Parker, Esquire  
Brantley C. Rowlen, Esquire  
Lewis, Brisbois, Bisgaard & Smith, LLP  
1180 Peachtree Street, NE, Suite 2900  
Atlanta, GA 30309-3521

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This 2<sup>nd</sup> day of August, 2018.



Jennifer Randolph Purdy  
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Nicholas G. Callas  
J. Scott Shirley  
Vanessa Crittenden Overbay  
Jennifer Randolph Purdy  
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August 2, 2018

**VIA HAND DELIVERY**

The Honorable Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

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SC Court of Appeals

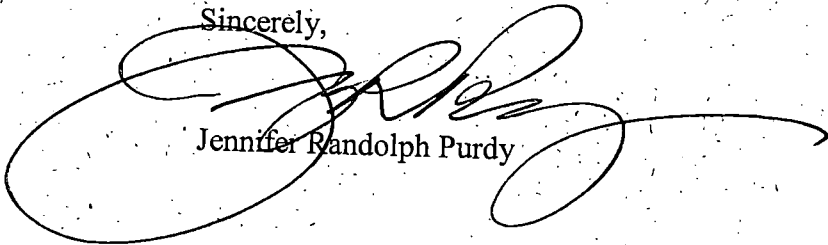
Re: Watkins v. Sterling Healthcare, Inc., et al.  
Court of Appeals Case No. 2018-000924

Dear Clerk Kitchings:

Enclosed please find the original and one (1) copy of the Respondent's Motion for Extension of Time in the above-referenced matter. Also enclosed is a check in the amount of \$25.00 to cover the filing fee.

Please file the original Motion and return the file stamped copy to my runner. Thank you in advance for your assistance with this matter.

Sincerely,

  
Jennifer Randolph Purdy

JRP:jn

Enclosures

cc: Leah Parker (w/ encl. via U.S. Mail)