

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM OCONEE COUNTY
Court of Common Pleas

R. Scott Sprouse, Circuit Court Judge

Case No.: 2018-CP-37-00271

RECEIVED

MAR 21 2019

SC Court of Appeals

Betty Herrington,

Respondent,

v.

SSC Seneca Operating Company,
LLC, d/b/a Seneca Health &
Rehabilitation Center;
SavaSeniorCare, LLC; SSC Equity
Holdings, LLC; SavaSeniorCare
Administrative Services, LLC;
SavaSeniorCare Consulting Services,
LLC

Defendants,

Of Whom SSC Seneca Operating
Company, LLC, d/b/a Seneca Health
& Rehabilitation Center;
SavaSeniorCare, LLC;
SavaSeniorCare Administrative
Services, LLC; SavaSeniorCare
Consulting Services, LLC

Appellants.

REQUEST FOR EXTENSION OF TIME

The undersigned does hereby move, pursuant to Rule 263(b) for an Order extending the time within which the Appellant shall file and serve Appellants' Reply Brief on the Respondents in the above-captioned matter. The undersigned respectfully requests an additional thirty (30) days within which to file and serve such matters.

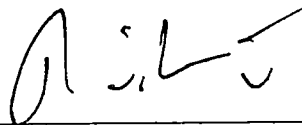
This Motion is based upon the fact that, due to other pending matters, Appellants' counsel is unable to allocate sufficient time to properly research the issues raised in Respondent's Brief and prepare the Appellant's Reply Brief which is due March 22, 2019.

Other Counsel of Record:

YOUNG CLEMENT RIVERS, LLP
P.O. Box 993
Charleston, SC 29402
Stephen L. Brown, Esq.
D. Jay Davis, Jr., Esq.
Perry M. Buckner, IV, Esq.
Russell G. Hines, Esq.

Attorneys for Appellants

RESPECTFULLY SUBMITTED,



Raymond T. Wooten (S.C. Bar No. 81483)

SMITH JORDAN, PA

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Attorney for Respondent

Easley, South Carolina
March 18, 2019

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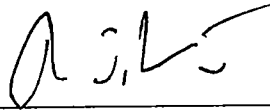
PROOF OF SERVICE

I certify that I have served the Request For Extension of Time to file and serve Appellant's Reply Brief on all Counsel of Record to the address below by depositing a copy of it in the United States Mail with postage prepaid on March 18, 2019 to all Counsel of Record.

Other Counsel of Record:

YOUNG CLEMENT RIVERS, LLP
P.O. Box 993
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Stephen L. Brown, Esq.
D. Jay Davis, Jr., Esq.
Perry M. Buckner, IV, Esq.
Russell G. Hines, Esq.

Attorneys for Appellants



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Easley, South Carolina
March 18, 2019

Smith Jordan^{PA}
– Attorneys at Law –

Ronnie L. Smith †
W. Grady Jordan
James E. Sterling
† Of Counsel

Raymond T. Wooten*
Thomas S. Phillips
*Licensed in SC & GA

March 18, 2019

RECEIVED
MAR 21 2019
SC Court of Appeals

Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RE: Betty Herrington vs. SSC Seneca Operating Company, LLC, et al.
Case No.: 2018-CP-37-00271

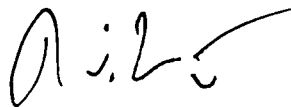
Dear Mrs. Kitchings:

Enclosed you will find an original and six (6) copies of a *Motion to Request Extension of Time* to file and serve Appellants' Reply Brief in connection with the above referenced appeal, along with an original and copies of a *Proof of Service*. Also enclosed is our check in the amount of **\$25.00** for the filing fee of same. Counsel for Respondent has been notified of this request and consents.

Please contact our office if you should have any questions or need further information.

With kindest regards, I remain

Sincerely,



Raymond T. Wooten

RTW/amr
Enclosures

cc: Client
Stephen L. Brown, Esq.
D. Jay Davis, Jr., Esq.
Perry M. Buckner, IV, Esq.
Russell G. Hines, Esq.



Smith Jordan
— Attorneys at Law —
PO Box 1207 | Easley, SC 29641

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SC Court of Appeals

Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
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Columbia, SC 29211

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