

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

Walton J. McLeod, IV, Circuit Court Judge

**RECEIVED**

MAY 14 2019

SC Court of Appeals

Appellate Case Number.: 2018-002236

Case No. 2016-CP-32-00950

Amy S. Davis, as Personal Representative of the Estate of  
Utricia Shealy, deceased, .....Respondent,

v.

Agape Nursing Rehabilitation Center, Inc., Agape Management Services, Inc., John Doe, Richard  
Roe Corporation, Jane Doe, and Mary Doe Corporation, ..... Defendants

Of which Agape Nursing Rehabilitation Center, Inc. and Agape Management Services,  
Inc., are the ..... Appellants.


**MOTION FOR EXTENSION OF TIME**

Pursuant to Rules 240 and 263, SCACR, the Appellant, through its undersigned attorneys,  
hereby moves this Court for an Order granting an Extension of Time for the filing of Respondent's  
Initial Brief. The grounds for this Motion are as follows:

1. Appellants' counsel received the Transcript of Record from Bethanie K. Creppon,  
Circuit Court Reporter to the Honorable Walton J. McLeod, IV, on April 15, 2019.
2. The Transcript of Record and numerous exhibits from the week-long jury trial of this  
case are voluminous; due to other work commitments and a week of illness suffered by  
the undersigned, additional time is needed for the Appellants' counsel to complete a

compilation of the Designation of Matter to be included in the Record on Appeal and Appellants' Initial Brief.

3. Counsel for the Appellant has consented to the relief requested in this motion.
4. The undersigned has not previously requested an extension of this time period and respectfully requests an additional fourteen (14) days from the service date of Transcript, which would make Respondents' Initial Brief and Designation of Matter due on or before May 29, 2019.



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Shaun C. Blake, Esq. (SC Bar #76349)  
ROGERS LEWIS JACKSON MANN & QUINN, LLC  
1901 Main Street, Suite 1200  
Columbia, SC 29201  
Tel: 803-256-1268

May 13, 2019

ATTORNEYS FOR THE APPELLANTS

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Honorable L. Casey Manning  
Trial Court Case No. 2016-CP-40-04718

Appellate Case No. 2018-001845

**RECEIVED**  
MAY 14 2019  
SC Court of Appeals

WFG National Title Insurance Company, Respondent,

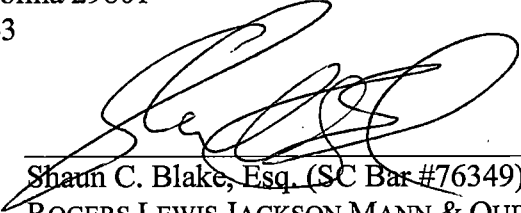
v.

DataQuick Lending Solutions, Inc. and DataQuick Lending Solutions, LLC, Appellants.

**PROOF OF SERVICE**

I certify that I have caused to be served a copy of the Motion for Extension of Time on Respondent Amy S. Davis, as Personal Representative of the Estate of Utricia Shealy, deceased, causing a copy of same to be deposited in the United States mail, postage prepaid, on May 13, 2019, addressed to the following:

C. Caleb Connor, Esq.  
A. Keith McAlister, Jr., Esq.  
Kenneth L. Connor, Esq.  
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302 Park Avenue, SE  
Aiken, South Carolina 29801  
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May 13, 2019

ATTORNEYS FOR THE APPELLANTS

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ATTORNEYS AT LAW

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May 13, 2019

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MAY 14 2019

SC Court of Appeals

**Via Hand Delivery**

Ms. Jenny Abbott Kitchings  
Clerk of Court – South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

Re: Amy S. Davis, as Personal Representative of the Estate of Utricia Shealy, v.  
Agape Nursing & Rehabilitation Center, Inc., and Agape Management Services,  
Inc.  
Appellate Case Number.: 2018-002236

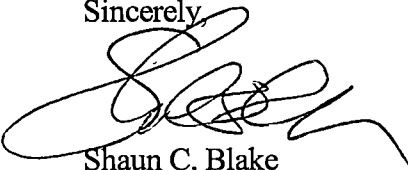
Dear Madam Clerk:

Enclosed please find an original and eight (8) copies of Agape Nursing & Rehabilitation Center, Inc. and Agape Management Services, Inc.'s Motion for Extension of Time, together with the Proof of Service and the \$50 filing fee. Please return a stamped copy to my staff that is delivering this letter.

By copy of this letter, and I serving the same upon counsel for the Respondent, Amy S. Davis as Personal Representative of the Estate of Utricia Shealy. Please let me know if you have any questions or concerns.

With highest professional regards, I am

Sincerely,



Shaun C. Blake

cc:

C. Caleb Connor, Esq.  
A. Keith McAlister, Jr., Esq.  
Kenneth L. Connor, Esq.  
CONNOR & CONNOR, LLC  
302 Park Avenue, SE  
Aiken, South Carolina 29801