

**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**

MAY 20 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 Administrative Services, LLC; and  
SavaSeniorCare Consulting Services, LLC,

Appellants.

**SECOND MOTION FOR EXTENSION OF TIME  
TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANTS**

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
Perry M. Buckner, IV (SC Bar No. 100031)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29402  
P.O. Box 993 (29402)  
843-720-5488

*Attorneys for Appellants*

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COME NOW Appellants, SSC Seneca Operating Company, LLC, d/b/a Seneca Health & Rehabilitation Center; SavaSeniorCare Administrative Services, LLC; and SavaSeniorCare Consulting Services, LLC, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an extension of ten (10) days' additional time to file/serve their initial reply brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed May 9, 2019, the deadline for Appellants' initial reply brief and designation of matter is due May 16, 2019. On account of work-related and other time commitments, Appellants respectfully request that this deadline be extended by 10 days (from May 16, 2019), i.e., through May 27, 2019<sup>1</sup>. Respectfully, Appellants believe that this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondents.

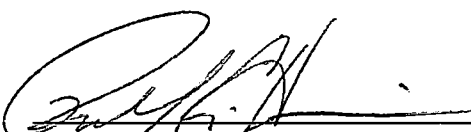
WHEREFORE, Appellants move this Honorable Court to grant them an additional extension of 10 days' time to file/serve their initial reply brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving their initial

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<sup>1</sup> Calculating the 10-day period (from today, May 16, 2019) in accordance with Rule 263(a), SCACR, it runs until Monday, May 27, 2019, because the 10<sup>th</sup> day is Sunday, May 26, 2019.

reply brief and designation of matter would be May 27, 2019, according to the undersigned's calculations. Further, Appellants respectfully request that the Court hold their present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

By:   
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
Perry M. Buckner, IV (SC Bar No. 100031)  
Russell G. Hines (SC Bar No. 72100)  
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P.O. Box 993 (29402)  
843-720-5488  
*Attorneys for Appellants*

Charleston, South Carolina

Dated: 5/16/19

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Defendants,

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

Appellants.

**PROOF OF SERVICE**

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
Perry M. Buckner, IV (SC Bar No. 100031)  
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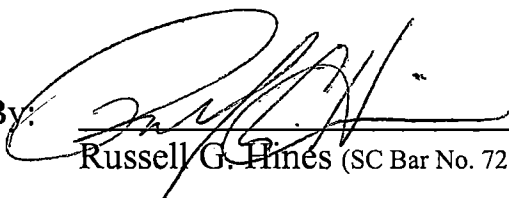
*Attorneys for Appellants*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellants, SSC Seneca Operating Company, LLC, d/b/a Seneca Health & Rehabilitation Center; SavaSeniorCare Administrative Services, LLC; and SavaSeniorCare Consulting, LLC (misidentified as “SavaSeniorCare Consulting Services, LLC”), hereby certify that the foregoing **SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANTS** was served on all other parties to this matter by depositing a copy of the same in the U.S. Mail on May 16, 2019, properly posted for delivery to the following addressees:

Raymond T. Wooten, Esquire  
Smith, Jordan & Lavery, P.A.  
1810 East Main Street  
Easley, SC 29640

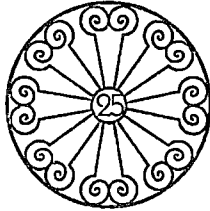
*Attorneys for Respondent Betty Herrington*

Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

By:   
\_\_\_\_\_  
Russell G. Hines (SC Bar No. 72100)  
*Attorneys for Appellants*

Charleston, South Carolina

Dated: 5/16/19



# YCR LAW

Kathleen B. Barnes  
Secretary

Direct Dial: (843) 720-5488  
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May 16, 2019

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MAY 20 2019

SC Court of Appeals

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

Re: Betty Herrington 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  
Appellate Case No. 2018-002088  
YCR File: 14653-20170810

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of our Second Motion for Extension of Time to File/Serve Initial Reply Brief of Appellants and the original and one (1) copy of the Proof of Service of same together with our firm's check in the amount of \$50.00 representing the filing fee. Please file the originals and return court-stamped copies to me in the enclosed envelope.

By copy to opposing counsel I am serving him with the same.

With best wishes and kindest regards, I am

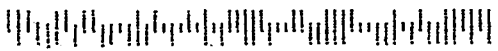
Sincerely,

YOUNG CLEMENT RIVERS, LLP

Kathleen B. Barnes  
Secretary

Enclosures

cc: Raymond T. Wooten, Smith, Jordan & Lavery, P.A.



05/16/2019

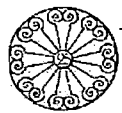
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Jenny Abbott Kitchings, Clerk of  
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