

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

Case No. 2016-CP-32-00950

RECEIVED

JUN 26 2019

SC Court of Appeals

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

v.

Agape Nursing & Rehabilitation Center, Inc., and Agape Management Services,
Inc.,.....Appellants.

RESPONDENT'S MOTION FOR EXTENSION OF TIME

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

1. Respondent's counsel received by mail Appellants' Initial Brief and Designation of Matter to be Included in the Record on Appeal on or around June 4, 2019.
2. Respondent's counsel received the Transcript of Record from Bethanie K. Creppon, Circuit Court Reporter to the Honorable Walton J. McLeod, IV, on June 12, 2019.
3. Appellants' initial brief cites numerous exhibits and pages of the Transcript of Record from the week-long jury trial.

4. Due to other work commitments, including but not limited to out-of-state depositions, and long-standing vacation plans, additional time is needed for the Respondent's counsel to complete its initial response brief, including its designation of additional matters to be included in the record on appeal.
5. Counsel for the Appellants have consented to the relief requested in this Motion.
6. The undersigned has not previously requested an extension of this time period and respectfully requests an additional fourteen (14) days from the service of the Transcript, which would make Respondent's Initial Brief and Designation of Matter due on or before July 12, 2019.

Respectfully submitted, this the 24th day of June, 2019.



C. Caleb Connor, SC Bar No. 100517.
A. Keith McAlister, Jr., SC Bar No. 78213
Kenneth L. Connor, SC Bar No. 100298
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Attorneys for Respondent

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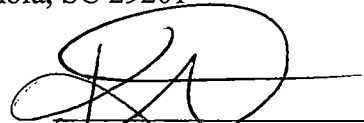
v.

Agape Nursing & Rehabilitation Center, Inc., and Agape Management Services,
Inc.,.....Appellants.

PROOF OF SERVICE

I certify that this the 24th day of June, 2019, I have caused to be served a copy of Respondent's Motion for Extension of Time on Appellants Agape Nursing & Rehabilitation Center, Inc. and Agape Management Services, Inc. causing a copy of same to be deposited in the United States mail, postage prepaid, addressed as following:

Shaun C. Blake, Esq.
Rogers Lewis Jackson Mann & Quinn, LLC
1901 Main Street, Suite 1200
Columbia, SC 29201



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TRIAL LAWYERS

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June 24, 2019

Amelia Smith
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

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Re: **Respondent's Motion for Extension of Time**
*Amy S. Davis, as Personal Representative of the Estate of Utricia Shealy,
deceased, Respondent v. Agape Nursing & Rehabilitation Center, Inc., and Agape
Management Services, Inc., Appellants*

Ms. Smith,

Enclosed please find a copy of Respondent's Motion for Extension of Time.

Please do not hesitate to contact us if you have any questions.

Kind regards,

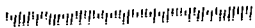
CONNOR & CONNOR, LLC

CIS

Chuck Sharkey
Paralegal

Enclosures

cc: Shaun Blake, Esq.



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