

91286

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Charleston County
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

Appellate Case No. 2019-001413
Circuit Court Case No. 2018-CP-10-01251

RECEIVED
OCT 28 2019
SC Court of Appeals

Richard Ladson, Jr.,
by and through Richard Miles Ladson, Sr., POA,

Respondent,

v.

THI of South Carolina at Charleston, LLC
d/b/a Riverside Health and Rehab,

Appellant.

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

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Appellant

NOW COMES Appellant, THI of South Carolina at Charleston, LLC d/b/a Riverside Health and Rehab, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and hereby moves for an extension of thirty (30) days' additional time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal.

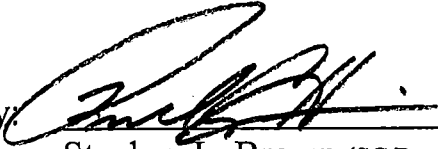
1. Presently, by order of this Court filed September 26, 2019, the deadline for Appellant's initial brief and designation is October 25, 2019.

2. On account of work-related and other time commitments, Appellant's counsel requests that this deadline be extended by 30 days (from October 25, 2019), i.e., through November 25, 2019.

3. The undersigned respectfully submits that this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellant moves this Honorable Court to grant it an extension of 30 days' additional time to file/serve its initial 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 Appellant's initial brief and designation would be November 25, 2019, according to the undersigned's calculations. Further, Appellant respectfully requests that the Court hold its 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)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Appellant

Charleston, South Carolina

Dated: 10/25/19

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Charleston County
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

Appellate Case No. 2019-001413
Circuit Court Case No. 2018-CP-10-01251

RECEIVED
OCT 28 2019
SC Court of Appeals

Richard Ladson, Jr.,
by and through Richard Miles Ladson, Sr., POA,

Respondent,

v.

THI of South Carolina at Charleston, LLC
d/b/a Riverside Health and Rehab,

Appellant.

PROOF OF SERVICE


YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Appellant

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellant, hereby certify that the foregoing **MOTION FOR SECOND EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANT** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on October 25, 2019, properly posted for delivery to the following addressees:

Carl E. Pierce, II, Esquire
Benjamin C. Smoot, II, Esquire
PIERCE, HERNS, SLOAN & WILSON, LLC
321 East Bay Street
Charleston, South Carolina 29401
Attorneys for Respondent

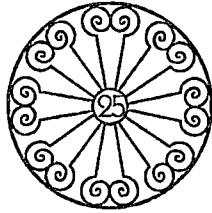
Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: 

Russell G. Hines (SC Bar No. 72100)
Attorneys for Appellant

Charleston, South Carolina

Dated: 10/25/19



YCR LAW

Kathleen B. Barnes
Secretary

Direct Dial: (843) 720-5488
Direct Fax: (843) 579-1369
E-mail: kbarnes@ycrlaw.com

October 25, 2019

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

RECEIVED
OCT 28 2019
SC Court of Appeals

Re: Richard Ladson v. THI of South Carolina at Charleston
Appellate Case No. 2019-001413
Case No.: 2019-001413
Claim No.: 1725747
YCR File: 14347-20170914

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of our Motion for Second Extension of Time to File/Serve Initial Brief of Appellant, the original and one (1) copy of the Proof of Service of same and 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.

With best wishes and kindest regards, I am

Sincerely,

YCR LAW, LLP

Kathleen B. Barnes
Secretary

Enclosures

(via US Mail and email)

Cc: Carl E. Pierce, II, Esquire, Pierce, Hems, Sloan & Wilson, LLC
Benjamin C. Smoot, II, Esquire, Pierce, Hems, Sloan & Wilson, LLC

Hasler
FIRST CLASS MAIL
10/25/2019
USPS STORE \$001.75²
ZIP 29401
61151286087

FIRST CLASS MAIL

 **YCRLAW**
Young Clement Rivers, LLP
3 CALDWAY STREET, SUITE 400
P.O. Box 993
CHARLESTON, SC 29402

SLB
14347-20170914

RECEIVED
OCT 28 2019
SC Court of Appeals

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