

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

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Appeal from Charleston County  
Court of Common Pleas  
Jennifer B. McCoy, Circuit Court Judge

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

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**RECEIVED**  
DEC 23 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, Appellant.  
d/b/a Riverside Health and Rehab,

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

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PIERCE, SLOAN, WILSON, KENNEDY,  
& EARLY, LLC  
Carl E. Pierce, II, (SC Bar No. 7946)  
Benjamin C. Smoot, II (Sc Bar No. 101372)  
P.O. Box 22437  
Charleston, South Carolina 29413  
843-722-7733

*Attorneys for Respondent Richard Ladson,  
Jr., by and through Richard Miles Ladson,  
Sr., POA*

NOW COMES Respondent, Richard Ladson, Jr., by and through Richard Miles Ladson, Sr., POA, 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, the deadline for Respondent's initial brief and designation is December 25, 2019.

2. On account of work-related and other time commitments, Respondent's counsel requests that this deadline be extended by 30 days (from December 25, 2019), i.e., through January 24, 2020.

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

WHEREFORE, Respondent 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 deadline for filing/serving Respondent's initial brief and designation would be January 24, 2020, according to the undersigned's calculations. Further, Respondent respectfully requests that the Court hold its present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

*[Signature Page to Follow]*

Respectfully submitted,

PIERCE, SLOAN, WILSON, KENNEDY &  
EARLY, LLC

By:       *3cxt*        
Carl E. Pierce, II (SC Bar No. 7946)  
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*Attorneys for Respondent Richard Ladson, Jr., by  
and through Richard Miles Ladson, Sr., POA*

Charleston, South Carolina  
December 18, 2019

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

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Appeal from Charleston County  
Court of Common Pleas  
Jennifer B. McCoy, Circuit Court Judge

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

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

v.

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

---

**PROOF OF SERVICE**

I, Benjamin C. Smoot, II, of Pierce, Sloan, Wilson, Kennedy & Early, LLC, counsel for Respondent Richard Ladson, Jr., by and through Richard Miles Ladson, Sr., POA, hereby certify that the foregoing **RESPONDENT'S MOTION FOR 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 December 18, 2019, properly posted for delivery to the following addressees:

Young Clement Rivers, LLP  
Stephen L. Brown  
D. Jay Davis, Jr.  
Russell G. Hines  
25 Calhoun St., Ste. 400  
Charleston, SC 29401  
PO Box 993 (29402)  
843-720-5488  
*Attorneys for Appellant*

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DEC 23 2019  
SC Court of Appeals

Respectfully submitted,

PIERCE, SLOAN, WILSON, KENNEDY  
& EARLY, LLC

By: BCS  
Benjamin C. Smoot, II (SC BAR NO.  
101372)  
*Attorney for Respondent Richard Ladson,  
Jr., by and through Richard Miles Ladson,  
Sr., POA*

Charleston, South Carolina

Dated: 12/18

# PIERCE | SLOAN

WILSON KENNEDY & EARLY LLC

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ALLAN P. SLOAN, III \*◆  
JOSEPH C. WILSON, IV †❖  
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December 19, 2019

**VIA U.S. MAIL**

The Honorable Jenny Abbott Kitchings  
Clerk, S.C. Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

**RECEIVED**  
DEC 23 2019  
SC Court of Appeals

Re: *Richard Ladson, Jr., by and through Richard Miles Ladson, SR, POA v. THI of South Carolina at Charleston, LLC. d/b/a Riverside Health and Rehab*  
Circuit Court C/A No. 2016-CP-10-4062  
Appellate Case No.: 2019-001413  
PSWKE File No.: P2812.00

Dear Ms. Kitchings:

Enclosed for filing, please find the original and seven (7) copies of the Respondents' Initial Brief as well as Respondents' Designation of Matter to be Included in the Record on Appeal in the above referenced matter. Please file the originals with the Court and return a clocked-in copy of each to our office via the enclosed envelope. Should you have any questions or concerns, please do not hesitate to contact our office.

Please feel free to contact me with any questions or concerns you may have.

With kind regards,

Sincerely,



Kelly D. Forrester  
Paralegal to Joseph C. Wilson, IV

Enclosures

cc: Stephen L. Brown, Esq.  
D. Jay Davis, Jr., Esq.

Russell G. Hines, Esq.

PIERCE, FENNER & SMITH  
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The Hon. Jenny Abbott Kitchings  
Clerk, SC Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

PIERCE, FENNER & SMITH  
SC Court of Appeals

