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**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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JAN 27 2020

**SC Court of Appeals**

Appellate Care 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,

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**SECOND 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 January 27, 2020.

2. On account of work-related and other time commitments, Respondent's counsel requests that this deadline be extended by 30 days (from January 27, 2020), i.e., through February 26, 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 February 26, 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:

73-c-81

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*

Charleston, South Carolina  
January 22, 2020

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

---

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.

**RECEIVED**

JAN 27 2020

SC Court of Appeals

**PROOF OF SERVICE**

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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 SECOND 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 January 22, 2020, 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*

Respectfully submitted,

PIERCE, SLOAN, WILSON, KENNEDY  
& EARLY, LLC

By:



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: 1/23/20

# PIERCE | SLOAN

WILSON KENNEDY & EARLY LLC

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† MEMBER SC, FL & GA BAR  
❖ OF COUNSEL  
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DANIEL F. LYNCH, IV

■ MEMBER SC & VA BAR

Direct Dial: (843) 725-7726  
Email: kellyforrester@piercesloan.com

January 23, 2020

**VIA U.S. MAIL**

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

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JAN 27 2020  
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 one copy of the Second Motion for Extension of Time to File/Serve Initial Brief of Respondent, along with the \$50.00 filing fee for the same. Please file the original with the Court and provide our office with a filed copy in the enclosed self-addressed 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 Benjamin C. Smoot, II

Enclosures

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

Russell G. Hines, Esq.

PIERCE, FENNER SMITH & KENNEDY & EARLY LLC  
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SC Court of Appeals

The Hon. Jenny Abbott Kitchings  
Clerk, SC Court of Appeals  
1220 Senate St.  
Columbia, SC 29201

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