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SMYTH WHITLEY, LLC
ATTORNEYS AT LAW

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FEB 05 2020

SC Court of Appeals

February 3, 2020

VIA UNITED STATES MAIL

Clerk of Court Jenny Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: *Irby Gibbons, as Power of Attorney for Marian Beverly Gibbons v. Stoney Hill Healthcare, Inc., d/b/a Millennium Post-Acute Rehabilitation, The Ensign Group, Inc., Hopewell Healthcare, Inc., Natasha Nadkarni, Jenni-Lynn Assisted Living, LLC d/b/a Jenni-Lynn Assisted Living Community, Premier Senior Living-Delaware, LLC, and Premier Senior Living, LLC*
Lexington County Civil Case No.: 2019-CP-32-02125
Appellate Case No.: 2019-002098

Dear Ms. Kitchings:

I hope my letter finds you well. I am writing to request a sixty-day extension for time to file the Appellants Initial Brief in this matter, which would make April 13, 2020 the new deadline. I recognize that a thirty-day request is customary in this Court, but am asking for additional time due to two date-certain trials I have scheduled in the next forty-five days, one in Horry County Common Pleas for the last week of February and the other commencing in U.S. District Court on March 16, 2020. Thank you for your consideration of my request. I have enclosed the corresponding \$50.00 filing fee and have copied all counsel of record on this correspondence to advise them of the same.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Kevin R. Horton

KRH/cmr
Enc.

cc: Lee D. Cope, Esquire/ Neil E. Alger, Esquire – *via email only*
William Alexander, Esquire – *via email only*
R. Gerald Chambers, Jr., Esquire/Allyce Bailey, Esquire – *via email only*



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ATTORNEYS AT LAW

126 Seven Farms Drive, First Citizens Plaza, Suite 260
Charleston, South Carolina 29492

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FEB 6, 2020

SC Court of Appeals

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South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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