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**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**  
MAR 04 2020  
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 EXTENSION OF TIME TO  
FILE/SERVE INITIAL REPLY 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 ten (10) days' additional time to file/serve its initial reply brief and corresponding designation of matter to be included in the record on appeal.

Presently, in accordance with Rule 208(a)(3), the deadline for Appellants' initial reply brief and designation of matter is today, March 2, 2020. On account of work-related and other time commitments, Appellant respectfully requests that this deadline be extended by 10 days (from March 2, 2020), i.e., through March 12, 2020. Respectfully, Appellant believes 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 10 days' additional time to file/serve its initial reply 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 reply brief and designation would be March 12, 2020, according to the undersigned's calculations. Further, Appellant respectfully requests that the Court hold its present initial-reply-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

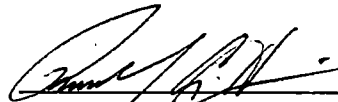
*[Signature on next page]*

*[Signature page for Motion for Extension of Time to File/Serve Initial Reply Brief  
of Appellant, Appellate Case No. 2019-001413]*

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:

3/2/20

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Appellant.

**PROOF OF SERVICE**

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
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Charleston, South Carolina 29401  
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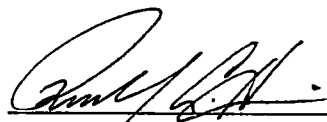
*Attorneys for Appellant*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellant, hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANT** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on March 2, 2020, 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*

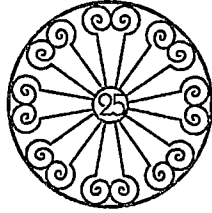
Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

By:   
\_\_\_\_\_  
Russell G. Hines (SC Bar No. 72100)

*Attorneys for Appellant*

Charleston, South Carolina

Dated: 3/2/20



# YCR LAW

Russell G. Hines  
Partner

Direct Dial: (843) 720-5488  
Direct Fax: (843) 579-1327  
E-mail: RHines@ycrlaw.com

March 2, 2020

**VIA FACSIMILE AND US MAIL**

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

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MAR 04 2020  
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 for filing, please find the original and seven (7) copies of a Motion for Extension of Time to File/Serve Initial Reply Brief of Appellant, the original and one (1) copy of a Proof of Service regarding the same, and our firm's check in the amount of \$50.00 to cover the costs associated with the filing of this motion. Kindly file the originals and return one court-stamped copy to me using the pre-stamped envelope provided. With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Russell G. Hines  
Partner

RGH/amj  
Enclosures

cc: Benjamin Catlett Smoot II, Pierce Sloan Kennedy & Early, LLC  
Carl E. Pierce II, Esquire, Pierce Sloan Kennedy & Early, LLC

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**FIRST CLASS MAIL**

 **YCRLAW** 25 Calhoun Street, Suite 400  
P.O. Box 993  
Charleston, SC 29402-0993

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

IGI  
14347-20170914

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MAR 04 7:00 AM  
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