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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

RECEIVED

MAR 16 2020

Appellate Case No. 2019-001413
Circuit Court Case No. 2018-CP-10-012

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.

**SECOND 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, by order of this Court filed March 6, 2020, the deadline for Appellants' initial reply brief and designation of matter is Thursday, March 12, 2020. On account of work-related and other time commitments, Appellant respectfully requests that this deadline be extended by 10 days (from March 12, 2020), i.e., through March 23, 2020. Respectfully, Appellant believes that this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

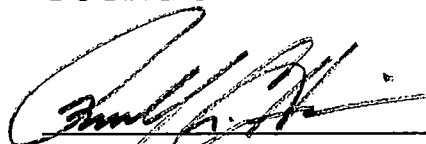
WHEREFORE, Appellant moves this Honorable Court to grant it an extension of 10 days' additional time to file/serve its initial reply brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving Appellant's initial reply brief and designation would be March 23, 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 page for Second 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

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Attorneys for Appellant

Charleston, South Carolina

Dated:

3/11/20

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

Appeal from Charleston County
Court of Common Pleas

RECEIVED

Jennifer B. McCoy, Circuit Court Judge

MAR 16 2020

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

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)
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Attorneys for Appellant

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellant, hereby certify that the foregoing **SECOND 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 11, 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

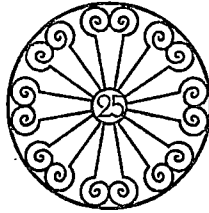
Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: 

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

Charleston, South Carolina

Dated: 3/11/20



YCR LAW

Kathleen B. Barnes
Secretary

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March 11, 2020

VIA US MAIL AND FASCIMILE

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

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MAR 16 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 please find the original and seven (7) copies of our Second Motion for Extension of Time to File/Serve Initial Reply 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: Benjamin Catlett Smoot II, Pierce Sloan Kennedy & Early, LLC
Carl E. Pierce II, Esquire, Pierce Sloan Kennedy & Early, LLC

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14347-20170914

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

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