

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM AIKEN COUNTY  
Court of Common Pleas  
Michael G. Nettles, Circuit Court Judge

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Appellate Case No. 2020-000584

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**RECEIVED**  
**Jul 07 2020**  
**SC Court of Appeals**

Jimmie Foreman, as Personal Representative of the Estate of  
Katie Dixon,.....Respondent,

v.

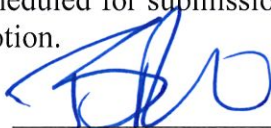
Shiloh Management Company, Inc, Pepper Hill Nursing Center, Inc., Pepper Hill  
Nursing & Rehab Center, LLC d/b/a Pepper Hill Nursing & Rehab  
Center,.....Appellants.

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**MOTION FOR ENLARGEMENT OF TIME  
TO FILE AND SERVE INITIAL BRIEF**

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Appellants herewith move for a thirty (30) day enlargement of time for the submission of their initial brief. The brief presently is scheduled for submission on or about July 13, 2020. A check for the filing fee accompanies this motion.



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Mark V. Gende, SC Bar No. 72835  
Brandon R. Gottschall, SC Bar No. 100621  
Sweeny Wingate & Barrow, P.A.  
Post Office Box 12129  
Columbia, South Carolina 29211  
(803)256-2233

**Attorneys for Appellants**

July 7, 2020

Columbia, South Carolina

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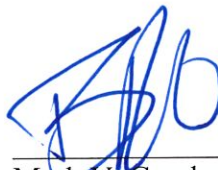
v.

Shiloh Management Company, Inc, Pepper Hill Nursing Center, Inc., Pepper Hill  
Nursing & Rehab Center, LLC d/b/a Pepper Hill Nursing & Rehab  
Center,.....Appellants.

**PROOF OF SERVICE**

The undersigned counsel for Appellants certifies that he has served a copy of the Motion for Enlargement of Time to File Initial Brief on the date shown below, by emailing the same to their counsel addressed as follows:

Jacob D. Born  
[jborn@csa-law.com](mailto:jborn@csa-law.com)  
Chappell, Smith & Arden, PA  
P.O. Box 12330  
Columbia, S.C. 29211  
(803) 929-3600  
**Attorney for Respondent**



Mark V. Gende, SC Bar No. 72835  
[mvg@swblaw.com](mailto:mvg@swblaw.com)  
Brandon R. Gottschall, SC Bar No. 100621  
[brg@swblaw.com](mailto:brg@swblaw.com)  
Sweeny Wingate & Barrow, P.A.  
Post Office Box 12129  
Columbia, South Carolina 29211  
(803)256-2233  
**Attorneys for Appellants**

**From:** [Gloria Coberly](#)  
**To:** ["Jacob Born"; "ericano@csa-law.com"](#)  
**Cc:** [Mark V. Gende; Brandon R. Gottschall](#)  
**Subject:** Foreman v. Shiloh; Appellate Case No. 2020-000584; Our File 3919-12243  
**Date:** Tuesday, July 07, 2020 2:52:00 PM  
**Attachments:** [Letter to Ms. Kitchings.pdf](#)  
[Motion for Enlargement of Time.pdf](#)

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Dear Mr. Born:

With regard to the above-referenced matter, attached please find correspondence from Brandon Gottschall to the South Carolina Court of Appeals along with Appellants' motion for enlargement of time in which to file and serve initial brief. The motion is being e-filed today and the transmittal letter and filing fee are being mailed by U.S. mail.

Sincerely,  
Gloria Coberly



Gloria P. Coberly | *Legal Assistant to Mark V. Gende and William A. Neinst*  
Sweeny, Wingate & Barrow, P.A.  
[gpc@swblaw.com](mailto:gpc@swblaw.com)  
1515 Lady St. (29201)  
Post Office Box 12129  
Columbia, SC 29211

T ■ 803-256-2233  
F ■ 803-256-9177

[Web](#) | [Email](#)

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**SC Court of Appeals**

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SWEENEY WINGATE & BARROW P.A.

July 7, 2020

Reply to: Main Office

Brandon R. Gottschall  
(803) 256-2233 x7132  
brg@swblaw.com

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Jul 07 2020

SC Court of Appeals

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

Re: *Jimmie Foreman, as the Personal Representative of the Estate of Katie Dixon v. Shiloh Management, Inc., Pepper Hill, et al.*  
Appellate Case No. 2020-000584  
Our File: 3919-12243

Dear Ms. Kitchings:

Enclosed please find our firm's check in the amount of \$50.00, which represents the filing fee for Appellant's Motion for Enlargement of Time to File and Serve Initial Brief. The related motion was uploaded to the Court of Appeal's efilng system and served on opposing counsel this same date.

Respectfully yours,

SWEENEY, WINGATE & BARROW, P.A.

Brandon R. Gottschall

BRG/gpc

Enclosure

cc: Jason Born, Esquire