

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

Appeal from Spartanburg County
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

Case No. 2019-CP-42-03075
Appellate Case No. 2020-000500

RECEIVED

Jul 15 2020

SC Court of Appeals

Betty Nanney,
by and through her Attorney-in-Fact, Leslie Nanney,

Respondent,

v.

THI of South Carolina at Spartanburg, LLC,
d/b/a Magnolia Manor-Spartanburg, Rusty Flathmann,
Laura Anne Winn, and Olishia Gaffney,

Appellants.

**MOTION FOR EXTENSION OF TIME
TO FILE/SERVE INITIAL BRIEF OF APPELLANTS**

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)
Kate C. Mettler (SC Bar No. 103762)
Gaillard T. Dotterer, III (SC Bar No. 103620)
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Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Appellants

COME NOW Appellants THI of South Carolina at Spartanburg, LLC d/b/a Magnolia Manor-Spartanburg, Rusty Flathmann, Laura Anne Winn, and Olishia Gaffney, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an extension of thirty (30) days' additional time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed June 18, 2020, the deadline for Appellants' initial brief and designation of matter is July 17, 2020. On account of work-related and other time commitments, Appellants respectfully request that this deadline be extended by 30 days (from July 17, 2020), i.e., through August 17, 2020. Respectfully, Appellants believe that this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellants move this Honorable Court to grant them an additional extension of 30 days' time to file/serve their initial 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 their initial brief and designation of matter would be August 17, 2020, according to the undersigned's calculations. Further, Appellants respectfully request that the Court hold their present initial-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 Brief of Appellants, Appellate Case no. 2020-000500)

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)

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Attorneys for Appellants

Charleston, South Carolina

Dated: 7/15/20

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Appellants.

PROOF OF SERVICE


YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
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Attorneys for Appellants

I, Russell G. Hines, of Young Clement Rivers, LLP, attorneys for Appellant, hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANTS** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on July 15, 2020, properly posted for delivery to the following addressees:

Gary W. Poliakoff, Esquire
Raymond P. Mullman, Jr., Esquire
Edward John Waelde, Esquire
Poliakoff & Associates, P.A.
P.O. Box 1571
Spartanburg, SC 29304
Attorneys for Respondent

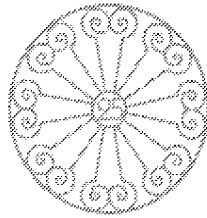
Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: 

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

Charleston, South Carolina

Dated: 7/15/20



YCR LAW

Pollyana Bell
Project Assistant

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July 15, 2020

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SC Court of Appeals

VIA FACSIMILE

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

Re: Betty Nanney, by and through her Attorney-In-Fact, Leslie Nanney v. THI of
South Carolina at Spartanburg, LLC d/b/a Magnolia Manor- Spartanburg; Rusty
Flathmann; Laura Anne Winn; and Olishia Gaffney
Appellate Case No. 2020-000500
Case No.: 2020-000500
YCR File: 14347-20190411

Dear Ms. Kitchings:

Please find enclosed an original Motion for Extension of Time to File/Serve Initial Brief of
Appellants and Proof of Service for filing in the above-referenced matter.

If additional copies or a filing fee are need please let me know. With best wishes and
kindest regards, I am

Sincerely,

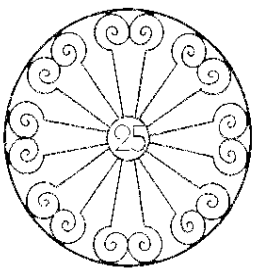
YOUNG CLEMENT RIVERS, LLP

Pollyana Bell
Project Assistant

/pbb

Enclosures

cc (via US mail & e-mail): E. John Waelde, Esquire
Gary W. Poliakoff, Esquire
Raymond P. Mullman, Jr., Esquire



YCR LAW

Young Clement Rivers, LLP

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To: 18037341839
From: pbell@ycrlaw.com
Date: July 15, 12:07:15 PM EDT
Subj: Appeal No. 2020-000500; Nanney v. THI
Pages: 7

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SC Court of Appeals

Please find the attached motion for filing in the above-referenced matter. If there are any issues with this filing please let us know.

Pollyana Bell
Project Assistant
Commercial Litigation Practice Group
Phone:(843)720-5488 | Fax:(843)579-1369



In view of current conditions and for the foreseeable future, YCR will be operating pursuant to its plan for continuous business services. With the imperative of safety in mind, our attorneys and staff will be working remotely as well as in our offices. In any event, we expect and intend to be able to respond in a timely manner to the needs and the requirements of clients, courts, colleagues, and friends. Thank you.

Young Clement Rivers, LLP
<http://www.ycrlaw.com>
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