

.THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

**RECEIVED**  
**Jul 30 2020**  
**SC Court of Appeals**

Case No. 2020-000473

White Oak Manor of Spartanburg, ..... Plaintiff,

v.

Paulette Smith-Young, .....Defendant,

AND

Paulette Smith-Young, Individually and as The Personal Representative of the Estate of Genobia Smith, Deceased, ..... Third-Party Plaintiff,

v.

White Oak Manor-Spartanburg, Inc. d/b/a White Oak of Spartanburg, and White Oak Management, Inc., ..... Third-Party Defendants

OF WHOM

White Oak Management, Inc. is .....Appellant,  
and

Paulette Smith-Young, Individually and as The Personal Representative of the Estate of Genobia Smith, Deceased, is .....Respondent.

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**SECOND MOTION TO EXTEND TIME TO FILE INITIAL REPLY BRIEF AND  
DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL**

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Appellant White Oak Management, Inc. moves the Court of Appeals pursuant to Rule 240, SCACR for an Order for a brief additional period of time extending Appellant's time to file its Initial Reply Brief and Designation of Matter to be Included in Record on Appeal. Appellant requests this extension for a period of five days, and represents it will not seek any further extensions. Appellant's Initial Reply Brief would be filed on or before Tuesday, August 4, 2020.

Appellant's counsel Ginger Goforth has been primarily handling briefing responsibilities in this matter. Counsel during the last seven days has been involved in an emergent and unexpected administrative agency issue that has significantly detracted from the time she has been able to spend reviewing and responding to Respondent's lengthy Initial Brief. Appellant therefore requires this brief additional time to adequately prepare its reply materials. Appellant does not interpose this request for delay, and Respondent will incur no prejudice. Appellant requests that all deadlines be held in abeyance pending the Court's ruling on this motion.

Respectfully submitted,

THE WARD LAW FIRM, P.A.  
Attorneys for Appellant

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July 30, 2020

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THE STATE OF SOUTH CAROLINA  
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APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

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**SC Court of Appeals**

Case No. 2018-CP-42-04174

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White Oak Manor of Spartanburg ..... Plaintiff,

v.

Paulette Smith-Young, ..... Defendant,

AND

Paulette Smith-Young, Individually and as The Personal Representative of the Estate of Genobia Smith, Deceased, ..... Third-Party Plaintiff,

v.

White Oak Manor-Spartanburg, Inc., d/b/a White Oak of Spartanburg, and White Oak Management, Inc., ..... Third-Party Defendants,

OF WHOM

White Oak Management, Inc. is ..... Appellant,  
and

Paulette Smith-Young, Individually and as The Personal Representative of the Estate of Genobia Smith, Deceased is ..... Respondent.

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## CERTIFICATE OF SERVICE

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The undersigned hereby certifies that the Appellant's Initial Brief and Designation of Matter to be Included in Record of Appeal was served upon the following on July 30, 2020 via electronic transmission and via United States Postal Service, with proper postage affixed thereto to the following address(es):

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July 30, 2020

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July 30, 2020

The Honorable Jenny Abbott Kitchings  
Court of Appeals Clerk of Court  
PO Box 11629  
Columbia, South Carolina 29211

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**Jul 30 2020**

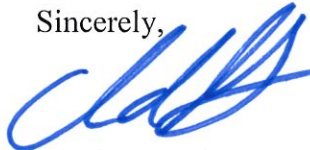
**SC Court of Appeals**

Re: White Oak Manor v. Paulette Smith-Young  
Appellate Case No. 2020-000473

Dear Ms. Kitchings:

Enclosed find one (1) original and one (1) copy of the Second Motion to Extend Time to File Initial Reply Brief and Designation of Matter to be included in Record on Appeal of Appellant, White Oak Management, Inc. Also, please find a Certificate of Service enclosed herewith. Please file the originals and return the clocked copies to me in the postage-paid, self-addressed envelope provided.

Sincerely,



Chad M. Graham

CMG/rlr  
Enclosures

Cc: Raymond P. Mullman, Jr., Esquire  
Gary W. Poliakoff, Esquire  
Jordan Calloway, Esquire