

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

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Appeal from Sumter County  
Court of Common Pleas  
Kristi F. Curtis, Circuit Court Judge

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Case No. 2017-CP-43-01740  
Appellate Case No. 2020-001143

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**RECEIVED**  
**Oct 12 2020**  
**SC Court of Appeals**

Andrietta Atkinson and Debra Clyburn-Wilson,  
individually and as Personal Representatives  
of the Estate of Willie Mae Clyburn,

Respondents,

v.

SSC Sumter East Operating Company, LLC  
d/b/a Sumter East Health and Rehabilitation Center  
and Paul Granger,

Defendants.

Of whom SSC Sumter East Operating Company, LLC  
d/b/a Sumter East Health and Rehabilitation Center is

Appellant.

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

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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)  
Alexandra J. Ginsberg (SC Bar No. 102251)  
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P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Appellant*

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COMES NOW Appellant SSC Sumter East Operating Company, LLC d/b/a Sumter East Health and Rehabilitation Center, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of thirty (30) days' additional time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed September 14, 2020, the deadline for Appellant's initial brief and designation of matter is October, 14, 2020. On account of work-related and other time commitments, Appellant respectfully requests that this deadline be extended by 30 days (from October 14, 2020), i.e., through November 13, 2020. Respectfully, Appellant believes that this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondents.

WHEREFORE, Appellant moves this Honorable Court to grant it an additional extension of 30 days' time to file/serve its 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 its initial brief and designation of matter would be November 13, 2020, according to the undersigned's calculations. Further, Appellant respectfully requests that the Court hold its present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

*(Signature page for Motion for Extension of Time to File/Serve Initial Brief of Appellant, Appellate Case No. 2020-001143)*

Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

By:  \_\_\_\_\_

Stephen L. Brown (SC Bar No. 66468)  
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*Attorneys for Appellant*

Charleston, South Carolina

Dated: 10/12/20

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Appellant.

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**PROOF OF SERVICE**

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YOUNG CLEMENT RIVERS, LLP  
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*Attorneys for Appellant*

I, Russell G. Hines, of Young Clement Rivers, LLP, attorneys for Appellant, hereby certify that Appellant's **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANT** was served on all other parties to this appeal on October 12, 2020, via email (see attached) to their following counsel of record:

D. Nathan Hughey, Esquire  
A. Stuart Hudson, Esquire  
Bradley H. Banyas, Esquire  
Hughey Law Firm, LLC  
P.O. Box 348  
Mt. Pleasant, SC 29465  
*Attorneys for Respondents*

Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

By:



Russell G. Hines (SC Bar No. 72100)

*Attorneys for Appellant*

Charleston, South Carolina

Dated: 10/12/20



YCR LAW

Pollyana Bell  
Project Assistant

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October 12, 2020

**VIA E-MAIL ONLY**

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

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**Oct 12 2020**

**SC Court of Appeals**

Re: Andrietta Atkinson and Debra Clyburn-Wilson, individually and as  
Personal Representatives of the Estate of Willie Mae Clyburn vs. SSC Sumter  
East Operating Company, LLC d/b/a Sumter East Health and Rehabilitation  
Center and Paul Granger  
Appellate Case No. 2020-001143  
Case No.: 2020-001143  
Claim No.: 16-PL-000157061  
YCR File: 14653-20170472

Dear Ms. Kitchings:

Enclosed please find a Motion for Extension of Time to File/Serve Initial Brief of Appellant  
and Proof of Service regarding the same for filing in the above-referenced matter.

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Pollyana Bell  
Project Assistant

/pbb

Enclosures

cc: A. Stuart Hudson, Esquire, [stuart@hugheylawfirm.com](mailto:stuart@hugheylawfirm.com)  
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D. Nathan Hughey Esquire, [nate@hugheylawfirm.com](mailto:nate@hugheylawfirm.com)