

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

Appeal from Georgetown County
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

Case No. 2019-CP-22-00961
Appellate Case No. 2020-001167

RECEIVED

Oct 16 2020

SC Court of Appeals

Kevin Greene,
as Attorney in Fact for and on Behalf of
Eleanor Greene Wragg,

Respondent,

v.

Palmetto Prince George Operating, LLC
d/b/a Prince George Healthcare Center;
Palmetto Health Care, LLC;
Murray Forman, Individually; and
Richard Porter, Individually,

Defendants.

Of whom Palmetto Prince George Operating, LLC
d/b/a Prince George Healthcare Center;
Palmetto Health Care, LLC; and
Richard Porter, Individually, are

Appellants.

**MOTION FOR SECOND 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)

Matthew O Riddle (SC Bar No. 76650)

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Attorneys for Appellants

COME NOW Appellants, Palmetto Prince George Operating, LLC d/b/a Prince George Healthcare Center, Palmetto Health Care, LLC, and Richard Porter, 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 September 21, 2020, the deadline for Appellants' initial brief and designation of matter is October, 19, 2020. On account of work-related and other time commitments, Appellants respectfully request that this deadline be extended by 30 days (from October 19, 2020), i.e., through November 18, 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 extension of 30 days' additional 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 November 18, 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.

<SIGNED ON THE FOLLOWING PAGE>

Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: s/Russell G. Hines
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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October 16, 2020

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Appellants.

PROOF OF SERVICE

YOUNG CLEMENT RIVERS, LLP

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Attorneys for Appellants

I, Russell G. Hines, of Young Clement Rivers, LLP, attorneys for Appellants, hereby certify that Appellants' **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANTS** was served on all other parties to this appeal on October 16, 2020, via email (see attached) to their following counsel of record:

Dirk J. Derrick, Esquire, dirk@derricklawfirm.com
S. Taylor Hooven, Esquire, taylor@derricklawfirm.com

The Derrick Law Firm
P.O. Box 28
Conway, SC 29528

Attorneys for Respondent

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines (SC Bar No. 72100)

Attorneys for Appellants

Charleston, South Carolina

October 16, 2020

From: [Hines, Russell](#)
To: taylor@derricklawfirm.com; dirk@derricklawfirm.com
Cc: [Justman, Aimee](#); [Bell, Pollyana \(Polly\)](#)
Subject: Greene v. Palmetto Prince George; Appellate Case No. 2020-001167
Date: Friday, October 16, 2020 5:59:42 PM
Attachments: [image001.png](#)
[Greene v. Palmetto Prince George \(App. Case No. 2020-001167\) -- Mot. for 2d Ext. re Initial Brief of Apps.pdf](#)

Attached please find Appellants' motion for a second extension of time to file/serve their initial brief in the above-referenced case. The motion will be filed with the Court of Appeals via separate email.

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