

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

Appeal from Richland County
Court of Common Pleas
L. Casey Manning, Circuit Court Judge

Case No. 2019-CP-40-02295
Appellate Case No. 2020-000501

RECEIVED
Nov 20 2020
SC Court of Appeals

Vermell Daniels
as Personal Representative of the Estate of Annie Porter,

Respondent,

v.

THI of South Carolina at Columbia, LLC
d/b/a Midlands Health & Rehabilitation Center,

Appellant.

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

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)
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P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Appellant

COMES NOW Appellant THI of South Carolina at Columbia, LLC d/b/a Midlands Health & Rehabilitation Center, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of ten (10) days' additional time to file/serve its initial reply brief and corresponding designation of matter to be included in the record on appeal.

Presently, in accordance with Rule 208(a)(3), the deadline for Appellant's initial reply brief and designation of matter is Monday, November 23, 2020. On account of work-related and other time commitments, Appellant respectfully requests that this deadline be extended by 10 days (from November 23, 2020), i.e., through December 3, 2020. Respectfully, Appellant believes that this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellant moves this Honorable Court to grant it an additional extension of 10 days' time to file/serve its initial reply 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 reply brief and designation of matter would be December 3, 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 on next page)

*(Signature page for Motion for Extension of Time to File/Serve Initial Reply Brief
of Appellant, Appellate Case no. 2020-000501*

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: 11/26/20

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PROOF OF SERVICE

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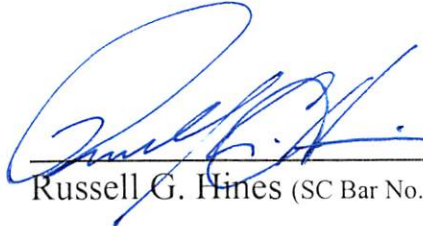
Attorneys for Appellant

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 REPLY BRIEF OF APPELLANT** was served on all other parties to this matter by emailing the same (see attached copy of said email) to their counsel of record (identified below) on November 20, 2020:

D. Nathan Hughey, Esquire
A. Stuart Hudson, Esquire
Bradley H. Banyas, Esquire
Hughey Law Firm, LLC
1311 Chuck Dawley Boulevard, Suite 201
Mt. Pleasant, SC 29464
Attorneys for Respondent

Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By:



Russell G. Hines (SC Bar No. 72100)

Attorneys for Appellant

Charleston, South Carolina

Dated: _____

11/20/20

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Friday, November 20, 2020 3:11 PM
To: 'nate@hugheylawfirm.com'; 'jwilson@hugheylawfirm.com';
'jordan@hugheylawfirm.com'; 'Jennifer@hugheylawfirm.com';
'nhughey@hugheylawfirm.com'; 'stuart@hugheylawfirm.com';
'sareeta@hugheylawfirm.com'; 'brad@hugheylawfirm.com'
Cc: Hines, Russell; Justman, Aimee
Subject: Daniels v. THI; Appellate Case No. 2020-000501
Attachments: Motion for Ext of Time to File-Serve Initial Reply Brief of Appellant.pdf

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

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



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