

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

Appeal from Sumter County
Court of Common Pleas

Kristi F. Curtis, Circuit Court Judge

Case No. 2017-CP-43-01740

Appellate Case No. 2020-001143

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

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Dec 29 2020

SC Court of Appeals

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.

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

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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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 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 today, Tuesday, December 29, 2020. On account of work-related and other time commitments, Appellant respectfully requests that this deadline be extended by 10 days (from December 29, 2020), i.e., through January 8, 2021. 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 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 January 8, 2021, according to the undersigned's calculations. Further, Appellant respectfully requests that the Court hold its present


initial-reply-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 Reply Brief, Appellate Case No. 2020-001143)

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP¹

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 Appellant

Charleston, South Carolina

Dated: December 29, 2020

¹ Please note that as of January 1, 2021, our firm name will change to **CLEMENT RIVERS, LLP**. Only the name will change. There will be no changes as to the e-mail addresses or telephone numbers for attorneys or staff.

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PROOF OF SERVICE

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 REPLY BRIEF** was served on all other parties to this appeal on December 29, 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, LLP²

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

Attorneys for Appellant

Charleston, South Carolina
Dated: December 29, 2020

² Please note that as of January 1, 2021, our firm name will change to **CLEMENT RIVERS, LLP**. Only the name will change. There will be no changes as to the e-mail addresses or telephone numbers for attorneys or staff.

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Tuesday, December 29, 2020 11:31 AM
To: 'stuart@hugheylawfirm.com'; 'jennifer@hugheylawfirm.com';
'sareeta@hugheylawfirm.com'; 'brad@hugheylawfirm.com';
'nate@hugheylawfirm.com'; 'jwilson@hugheylawfirm.com';
'jordan@hugheylawfirm.com'
Cc: Hines, Russell; Justman, Aimee
Subject: Atkinson v. SSC Sumter East; Appellate Case No. 2020-001143
Attachments: Mtn for Ext of Time to File-Serve Initial Reply Brief.pdf

Enclosed please find Appellant's Motion for Extension of Time to File/Serve Initial Reply Brief which is being electronically filed with the Court today.

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



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