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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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DEC 29 2020

**SC Court of Appeals**

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APPEAL FROM AIKEN COUNTY  
Court of Common Pleas  
Michael G. Nettles, Circuit Court Judge

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Appellate Case No. 2020-000584

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Jimmie Foreman, as Personal Representative of the Estate of Katie Dixon, Respondent,

v.

Shiloh Management Company, Inc., Pepper Hill Nursing Center, Inc., Pepper Hill Nursing & Rehab Center, LLC d/b/a Pepper Hill Nursing & Rehab Center, The Place at Pepper Hill, LLC, Pepper Hill Senior Properties, LLC, d/b/a The Place at Pepper Hill, Defendants,

of which Shiloh Management Company, Inc., Pepper Hill Nursing Center, Inc., Pepper Hill Nursing & Rehab Center, LLC d/b/a Pepper Hill Nursing & Rehab Center are the Appellants.

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**JOINT MOTION TO STAY OR, IN THE ALTERNATIVE,  
FOR EXTENSION OF TIME TO FILE REPLY**

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Appellants and Respondents jointly move to stay all pending deadlines in this matter or, in the alternative, for an extension of time as set forth below. This motion is based on the settlement agreement and pending settlement approval of the underlying case. Specifically, on or about November 30, 2020, the parties mediated and reached a settlement agreement. However, this matter is still pending settlement approval by the Circuit Court.

As a result, the parties jointly request that the Court of Appeals stay all pending deadlines in this matter to permit the Circuit Court the opportunity to approve the settlement. In the alternative, the parties seek an extension of an additional 60 days to the deadline for Appellants to serve and file their reply brief.

Extraordinary circumstances exist for the stay or extension because while the parties have reached a settlement agreement, South Carolina law requires that this settlement be approved by the Circuit Court, which remains pending. As a result, the need for the stay or extension is based on matters outside the parties' control. Further, the stay or extension will preserve both judicial and party resources. Finally, the stay or extension serves the interests of justice.

s/ Brandon R. Gottschall  
Mark V. Gende, SC Bar No. 72835  
[mvg@swblaw.com](mailto:mvg@swblaw.com)  
Brandon R. Gottschall, SC Bar No. 100621  
[brg@swblaw.com](mailto:brg@swblaw.com)  
Sweeny Wingate & Barrow, P.A.  
Post Office Box 12129  
Columbia, South Carolina 29211  
(803) 256-2233

**Attorneys for Appellants**

s/ James D. George, Jr.  
Jacob D. Born, SC Bar No. 100026  
[jborn@csa-law.com](mailto:jborn@csa-law.com)  
James D. George, Jr., SC Bar No. 103634  
[jgeorge@csa-law.com](mailto:jgeorge@csa-law.com)  
Chappell, Smith & Arden, PA  
P.O. Box 12330  
Columbia, S.C. 29211  
(803) 929-3600

**Attorneys for Respondents**

December 22, 2020

Columbia, South Carolina

# S·W·B

SWEENEY WINGATE & BARROW P.A.

December 22, 2020

Reply to: Main Office

Brandon R. Gottschall  
(803) 256-2233 x7132  
brg@swblaw.com

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

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SC Court of Appeals

Re: *Foreman v. Shiloh, et al.*  
Civil Action No. 2019CP0202824  
Appellate Case No. 2020-000584  
Our File: 3919-12243

Dear Ms. Kitchings:

Enclosed please find our firm's check in the amount of \$50.00, representing the filing fee for the parties' Joint Motion to Stay or in Alternative for an Extension, which was e-filed today.

Yours truly,

SWEENEY, WINGATE & BARROW, P.A.



Brandon R. Gottschall

BRG/gpc

cc: Jacob D. Born, Esquire, [jborn@csa-law.com](mailto:jborn@csa-law.com)  
James D. George, Jr., [jgeorge@csa-law.com](mailto:jgeorge@csa-law.com)

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SWEENEY WINGATE & BARROW P.A.

1515 LADY ST. (29201) ■ PO BOX 12129 ■ COLUMBIA, SC 29211



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