

**Jan 27 2021**

**SC Court of Appeals**

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

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Appeal from Georgetown County  
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

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

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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.

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

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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)  
Gaillard T. Dotterer, III (SC Bar No. 103620)  
25 Calhoun Street, Suite 400  
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P.O. Box 993 (29402)  
(843) 720-5488  
*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 ten (10) days' additional time to file/serve their initial reply brief.

Presently, in accordance with Rule 208(a)(3), the deadline for Appellants' initial reply brief is today, January 28, 2021. On account of work-related and other time commitments, Appellants respectfully request that this deadline be extended by 10 days (from January 28, 2021), i.e., through February 8, 2021. 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 10 days' additional time to file/serve their initial reply brief. With the extension requested herein, the new deadline for filing/serving their initial reply brief would be February 8, 2021, according to the undersigned's calculations. Further, Appellants respectfully request that the Court hold their present initial-reply-brief deadline in abeyance until it acts upon this motion.

*(Signature on the next page)*

*(Signature page for Motion for Extension of Time to File/Serve Initial Reply Brief  
of Appellants, Appeal No. 2020-001167)*

Respectfully submitted,

CLEMENT RIVERS, LLP

By:

s/ 

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 Appellants*

Charleston, South Carolina

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Of whom Palmetto Prince George Operating, LLC  
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Appellants.

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**PROOF OF SERVICE**

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CLEMENT RIVERS, LLP

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*Attorneys for Appellants*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that Appellants' **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANTS** was served on all other parties to this appeal on January 27, 2021, via email (see attached) to their following counsel of record:


Dirk J. Derrick, Esquire, [dirk@derricklawfirm.com](mailto:dirk@derricklawfirm.com)  
S. Taylor Hooven, Esquire, [taylor@derricklawfirm.com](mailto:taylor@derricklawfirm.com)  
The Derrick Law Firm  
P.O. Box 28  
Conway, SC 29528

*Attorneys for Respondent*

Respectfully submitted,

CLEMENT RIVERS, LLP

By:

  
\_\_\_\_\_  
Russell G. Hines (SC Bar No. 72100)

*Attorneys for Appellants*

Charleston, South Carolina

January 27, 2021

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**Bell, Pollyana (Polly)**

SC Court of Appeals

**From:** Bell, Pollyana (Polly)  
**Sent:** Wednesday, January 27, 2021 1:09 PM  
**To:** 'taylor@derricklawfirm.com'; 'dirk@derricklawfirm.com'  
**Cc:** Hines, Russell; Justman, Aimee  
**Subject:** Greene v. Palmetto Prince George; Appellate Case No. 2020-001167  
**Attachments:** Mtn for Ext of Time to File-Serve Initial Reply Brief.pdf

Attached please find Appellants' motion for extension of time to file/serve their initial reply brief in the above-referenced matter which is being filed today.

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



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