

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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Feb 18 2021

SC 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

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 EXTENSION OF TIME TO FEBRUARY 19, 2021,
TO FILE/SERVE APPELLANTS' INITIAL REPLY BRIEF**

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

NOW COME Appellants, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move this Honorable Court for an extension to tomorrow, Friday, February 19, 2021, to file/serve their initial reply brief and any corresponding designation of additional matter to be included in the record on appeal.

The present deadline for Appellants' initial reply brief and any corresponding designation of matter is today, Thursday, February 18, 2021. On account of work-related and other time commitments (including the fact that the instant reply briefing deadline happened to coincide with a reply briefing deadline today in another of the undersigned's appeals and also a mediation today in another of the undersigned's cases), the undersigned is in need of one (1) additional day's time, i.e., to tomorrow, Friday, February 19, 2021, and hopes the Court will deem the circumstances worthy of the relief requested herein, which relief he humbly submits is an appropriately modest dispensation that is consistent with the interests of justice and will not result in any undue prejudice to Respondent or delay.

WHEREFORE, Appellants move for an extension of time to Friday, February 19, 2021, to file/serve their initial reply brief and any corresponding designation of matter to be included in the record on appeal. Further, Appellants respectfully request that the Court hold the present deadline in abeyance until it acts upon this motion.

Respectfully submitted,
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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PROOF OF SERVICE

CLEMENT RIVERS, LLP

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Attorneys for Appellants

I, Russell G. Hines, of Clement Rivers, LLP, counsel for Appellants, do hereby certify that the **INITIAL REPLY BRIEF OF APPELLANTS** and **APPELLANTS' REPLY DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** were served on all other parties to this matter on February 18, 2021, via email (see attached) to Respondent's following counsel of record:

Dirk J. Derrick, Esquire
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Attorneys for Respondent

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
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Attorneys for Appellants

Charleston, South Carolina

February 18, 2021

From: [Hines, Russell](#)
To: "dirk@derricklawfirm.com"; "taylor@derricklawfirm.com"
Subject: App. Case No. 2020-001167 (Greene v. Palmetto Prince George) -- Motion for Extension to 2-19-21 for Initial Reply Brief of Appellant
Date: Thursday, February 18, 2021 10:41:37 PM
Attachments: [image001.png](#)
[App. Case No. 2020-001167 \(Greene v. Palmetto Prince George\) -- Mot. for Reply Ext. to 2-19.pdf](#)

Attached with regard to the above-referenced case please find a **Motion for Extension of Time to February 19, 2021, to File/Serve Appellants' Initial Reply Brief.**

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