

**RECEIVED**

**Aug 11 2021**

**SC Court of Appeals**

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

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Appeal from Charleston County  
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

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Circuit Court Case No. 2016-CP-10-05379  
Appellate Case No. 2020-001643

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The Estate of Delila Parrott,

Respondent

v.

Sandpiper Independent and Assisted Living-Delaware, LLC,

Appellant.

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**MOTION FOR EXTENSION OF TIME  
TO FILE/SERVE INITIAL 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)  
25 Calhoun Street, Suite 400 (29401)  
P.O. Box 993  
Charleston, South Carolina 29402  
(843) 720-5488  
*Attorneys for Appellant*

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COMES NOW Appellant Sandpiper Independent and Assisted Living-Delaware, LLC, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of two (2) days' additional time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed July 12, 2021, the deadline for Appellant's initial brief and designation of matter is today, August 11, 2021. The undersigned is responsible for the care of his 92 year old grandmother who experienced unexpected health issues this past weekend.<sup>1</sup> The undersigned has consulted with opposing counsel, who has indicated they do not oppose this motion. As such, the undersigned hereby respectfully requests that this deadline be extended by 2 days (from August 11, 2021), i.e., through August 13, 2021. 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 2 days' time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal. With the extension

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<sup>1</sup> The undersigned is Attorney Stephen L. Brown. I am the attorney with primary responsibility for this brief.

requested herein, the new deadline for filing/serving its initial brief and designation of matter would be August 13, 2021, 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 page for Motion for Extension of Time to File/Serve Initial Brief of Appellants, Appellate Case No. 2020-001643]*

Respectfully submitted,

CLEMENT RIVERS, LLP

By: 

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)

25 Calhoun Street, Suite 400 (29401)

P.O. Box 993

Charleston, South Carolina 29402

(843) 720-5488

*Attorneys for Appellant*

Charleston, South Carolina

Dated: Aug. 11, 2021

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**PROOF OF SERVICE**

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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)  
25 Calhoun Street, Suite 400 (29401)  
P.O. Box 993  
Charleston, South Carolina 29402  
(843) 720-5488  
*Attorneys for Appellant*

I, Stephen L. Brown, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANTS** was served on all other parties to this appeal on August 11, 2021, via email (see attached) to their following counsel of record:

Paul L. Reeves, Esquire  
Todd R. Lyle, Esquire  
Reeves & Lyle, LLC  
P. O. Box 11126  
Columbia, SC 29211

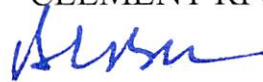
and

John G. Boswell, Esquire  
211 Hawthorne Rd  
Raleigh, NC 27605

*Attorneys for Respondent*

Respectfully submitted,  
CLEMENT RIVERS, LLP

By:



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Stephen L. Brown (SC Bar No. 66468)

*Attorneys for Appellant*

Charleston, South Carolina

Dated: August 11, 2021

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Wednesday, August 11, 2021 4:15 PM  
**To:** 'Paul@ReevesandLyle.com'; 'todd@reevesandlyle.com'; 'john.boswell.us@gmail.com'  
**Cc:** 'Stephen Brown (sbrown@ycrlaw.com)'; Justman, Aimee; Hines, Russell  
**Subject:** Appellate Case No. 2020-001643; Parrott v. Sandpiper  
**Attachments:** Mtn for Ext of Time.pdf

Good afternoon, enclosed please find Appellant's Motion for Extension of Time to File/Serve their Initial Brief which we intend to file today.

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



**CLEMENT RIVERS, LLP**  
25 Calhoun Street • Suite 400 • Charleston, SC 29401  
704.535.1100