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Aug 31 2021

SC Court of Appeals

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

Appeal from Dorchester County
Court of Common Pleas

Maite Murphy, Circuit Court Judge

Case No. 2020-CP-18-01027

Paulette Walker
as Personal Representative of the Estate of Albert Walker,

Respondent,

v.

Hallmark Longterm Care, LLC
d/b/a Hallmark Healthcare Center
and Durena Stinson,

Defendants,

Of whom Hallmark Longterm Care, LLC
d/b/a Hallmark Healthcare Center is

Appellant.

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

CLEMENT RIVERS, LLP

Stephen L. Brown (SC Bar No. 66468)

D. Jay Davis, Jr. (SC Bar No. 12084)

James D. Gandy, III (SC Bar No. 11925)

Russell G. Hines (SC Bar No. 72100)

Kate C. Mettler (SC Bar No. 103762)

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25 Calhoun Street, Suite 400

Charleston, South Carolina 29401

(843) 720-5488

Attorneys for Appellant

COMES NOW Appellant Hallmark Longterm Care, LLC d/b/a Hallmark Healthcare Center, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of thirty (30) 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 August 2, 2021, the deadline for Appellant's initial brief and designation of matter is September 1, 2021. On account of work-related and other time commitments, Appellant respectfully requests that this deadline be extended by 30 days (from September 1, 2021), i.e., through October 1, 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 30 days' time to file/serve its initial 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 brief and designation of matter would be October 1, 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 on next page)

*(Signature page for Motion for Extension of Time to File/Serve
Initial Brief of Appellant, Appeal No. 2021-000594)*

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Stephen L. Brown (SC Bar No. 66468)
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PROOF OF SERVICE

CLEMENT RIVERS, LLP

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Attorneys for Appellant

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, hereby certify that the **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANT** was served on Respondent, Paulette Walker, as Personal Representative of the Estate of Albert Walker, on August 31, 2021, by emailing (see attached) a copy of the same to Respondent's counsel of record:

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Attorneys for Respondent

Respectfully submitted,

CLEMENT RIVERS, LLP

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Russell G. Hines (SC Bar No. 72100)

Attorneys for Appellant

Charleston, South Carolina

August 31, 2021

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Tuesday, August 31, 2021 4:16 PM
To: 'nate@hugheyfirm.com'; 'stuart@hugheyfirm.com'; 'brad@hugheyfirm.com'; 'Jennifer@hugheyfirm.com'
Cc: Hines, Russell; Justman, Aimee
Subject: Walker v. Hallmark; Appellate Case No. 2021-000594
Attachments: Mtn for Ext of Time to File-Serve Initial Brief of Appellant.pdf

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
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