

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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Oct 01 2021

SC Court of Appeals

Appeal from Dorchester County
Court of Common Pleas

Maite Murphy, Circuit Court Judge

Case No. 2020-CP-18-01027
Appellate Case No. 2021-000594

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 OCTOBER 6, 2021,
TO FILE/SERVE INITIAL BRIEF OF APPELLANT**

CLEMENT RIVERS, LLP
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D. Jay Davis, Jr. (SC Bar No. 12084)
James D. Gandy, III (SC Bar No. 11925)
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Attorneys for Appellant

NOW COMES 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 this Honorable Court for an extension of three (3) business days' additional time, i.e., to Wednesday, October 6, 2021, 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 September 1, 2021, the deadline for Appellants' initial brief and designation is today, October 1, 2021.¹ On account of work-related and other time commitments and the recent disruption of his ordinary work schedule due to COVID-19,² the undersigned is in need of a small amount of additional time to complete the Initial Brief of Appellant, and most respectfully, he hopes the Court will deem the circumstances worthy of the relief requested herein, the grant of which he humbly submits is warranted as an appropriately modest dispensation that is consistent with the interests of justice and will not result in any undue prejudice to Respondent or delay.

¹ Please know that the undersigned recognizes that the Court's September 1 order states, "No further extensions will be granted absent extraordinary circumstances," and that he does not make the instant motion lightly.

² Right after Labor Day weekend, the undersigned began feeling sick, which led to a positive COVID-19 test (for himself as well as for his two children), which led to the undersigned being out of the office for some two weeks (and his children "home schooling"), which substantially (and, of course, unexpectedly) disrupted the undersigned's ordinary work schedule.

WHEREFORE, Appellant moves for an additional extension of three (3) days' time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal, i.e., an extension to Wednesday, October 6, 2021. Further, Appellant respectfully requests that the Court hold its present initial-briefing/designation-of-matter 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)
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October 1, 2021

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PROOF OF SERVICE

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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 OCTOBER 6, 2021, TO FILE/SERVE INITIAL BRIEF OF APPELLANT** was served on Respondent on October 1, 2021, by emailing (see attached) a copy of the same to her counsel of record:

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Attorneys for Respondent

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines (SC Bar No. 72100)

Attorneys for Appellant

Charleston, South Carolina

October 1, 2021

From: [Hines, Russell](#)
To: ["nate@hugheylawfirm.com"](#); ["stuart@hugheylawfirm.com"](#); ["Brad Banyas"](#)
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Subject: Walker v. Hallmark (2021-000594) -- Appellant's Motion for Ext to 10-6-21
Date: Friday, October 1, 2021 10:57:32 PM
Attachments: [image001.png](#)
[Walker v. Hallmark \(2021-000594\) -- Motion for Ext to 10-6-21.pdf](#)

Attached regarding the above-referenced matter please find Appellant's **Motion For Extension Of Time To October 6, 2021, To File/Serve Initial Brief Of Appellant.**

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