

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

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Oct 11 2021

SC Court of Appeals

Appeal from Charleston County
Court of Common Pleas

The Honorable Bentley Price, Circuit Court Judge

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

The Estate of Delila Parrott,

Respondent,

v.

Sandpiper Independent and Assisted Living-Delaware, LLC,

Appellant.

MOTION FOR EXTENSION OF TIME

COMES NOW, the Respondent Estate of Delila Parrott, by and through its undersigned counsel, and hereby moves the Court, pursuant to Rule 240, SCACR, for an extension of time for thirty (30) days to file the Initial Brief of Respondent with her Initial Designations of Matter to be included in the Record on Appeal in this action. In support hereof, the undersigned states the following:

1. By order of the Court, dated September 10, 2021, the Respondent was granted a first extension and the current deadline is October 13, 2021.

2. The undersigned Counsel for the Respondent submits that he has been unable to complete the brief due to other deadlines and commitments, and further submits that an extension would not unduly delay these proceedings and would not cause prejudice to the Appellant.
3. Appellant's Counsel, Stephen L. Brown, has kindly given his consent for this extension, as evidenced by a copy of the email communication attached hereto.

WHEREFORE, Respondent respectfully requests a 30-day extension until November 12, 2021, in which to file the Initial Brief of Respondent with her Initial Designations in this action.

Respectfully submitted,

REEVES AND LYLE, LLC

/s/ Paul L. Reeves
Paul L. Reeves (S.C. Bar # 4671)
Todd R. Lyle (SC # 102308)
P.O. Box 11126
Columbia, South Carolina 29211
Phone: 803-920-0001
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ATTORNEY FOR RESPONDENT

Jennifer Szumilas

From: Brown, Stephen L. <sbrown@ycrlaw.com>
Sent: Monday, October 11, 2021 11:26 AM
To: Paul Reeves
Cc: Jennifer Szumilas
Subject: RE: Parrott v. Sandpiper

Of course.

Stephen L. Brown | Partner

Clement Rivers, LLP
Chair | Commercial Litigation
(843) 720-5488



CLEMENT RIVERS, LLP

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From: Paul Reeves <paul@reevesandlyle.com>
Sent: Monday, October 11, 2021 11:25 AM
To: Brown, Stephen L. <sbrown@ycrlaw.com>
Cc: Jennifer Szumilas <Jennifer@reevesandlyle.com>
Subject: Parrott v. Sandpiper

Good morning. I am reaching out to obtain your permission/consent to obtain a thirty day extension to file the Respondent's Brief which is due on October 13, 2021. I appreciate your anticipated consent, should you deem that appropriate.

Thank you,

Paul

Clement Rivers, LLP
<http://www.ycrlaw.com>
Charleston: (843) 577-4000

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