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Oct 20 2021

SC Court of Appeals

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

Appeal from Florence County
Court of Common Pleas

William H. Seals Jr., Circuit Court Judge

Case No. 2020-CP-21-02290

Mary Tisdale
as Personal Representative of the Estate of Earlene Seabrook,

Respondent,

v.

Palmetto Lake City Operating, LLC
d/b/a Lake City-Scranton Healthcare Center
and Jeffrey Gibbs,

Defendants,

Of whom Palmetto Lake City Operating, LLC
d/b/a Lake City-Scranton 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)

Matthew O. Riddle (SC Bar No. 76650)

Russell G. Hines (SC Bar No. 72100)

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P.O. Box 993 (29402)

(843) 720-5488

Attorneys for Appellant

COMES NOW Appellant, Palmetto Lake City Operating, LLC d/b/a Lake City-Scranton 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 September 23, 2021, the deadline for Appellant's initial brief and designation of matter is today, October 20, 2021. On account of work-related and other time commitments, Appellant respectfully requests that this deadline be extended by 30 days (from October 20, 2021), i.e., through November 19, 2021. Respectfully, Appellant believes 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 November 19, 2021, according to the undersigned's calculations. Further, Appellant respectfully requests that the Court hold the 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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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, Mary Tisdale, as Personal Representative of the Estate of Earlene Seabrook, on October 20, 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

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

Attorneys for Appellant

Charleston, South Carolina

October 20, 2021

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Wednesday, October 20, 2021 4:20 PM
To: 'nate@hugheyfirm.com'; 'Stuart Hudson'; 'brad@hugheyfirm.com'
Cc: Hines, Russell; Justman, Aimee
Subject: Appellate Case No. 2021-000586; Tisdale v. Palmetto Lake City
Attachments: Tisdale v. Palmetto Lake City (21000586) -- Motion for Ext.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
Commercial Litigation Practice Group
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