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Nov 18 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 REPLY 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)
T. Ashton Phillips, III (SC Bar No. 104227)
25 Calhoun Street, Suite 400
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(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 ten (10) days' time to file/serve its initial reply brief and corresponding designation of matter to be included in the record on appeal.

Presently, in accordance with Rule 208(a)(3), the deadline for Appellant's initial reply brief and designation of matter is Monday, November 22, 2021. On account of work-related and other time commitments, Appellant respectfully requests that this deadline be extended by 10 days (from November 22, 2021), i.e., through December 2, 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 extension of 10 days' time to file/serve its initial reply 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 reply brief and designation of matter would be December 2, 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 Reply 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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Charleston, South Carolina

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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 REPLY BRIEF OF APPELLANT** was served on Respondent, Paulette Walker, as Personal Representative of the Estate of Albert Walker, on November 18, 2021, by emailing (see attached) a copy of the same to Respondent's counsel of record:

D. Nathan Hughey, Esquire
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1311 Chuck Dawley Boulevard, Suite 201
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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

November 18, 2021

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Thursday, November 18, 2021 4:00 PM
To: 'nate@hugheyfirm.com'; 'Stuart Hudson'; 'brad@hugheyfirm.com';
'Jennifer@hugheyfirm.com'
Cc: Hines, Russell; Justman, Aimee
Subject: Walker v. Hallmark Longterm Care, LLC - Appellate Case No. 2021-000594
Attachments: Mtn for Ext of Time to File-Serve Initial Reply Brief of Appellant.pdf

Enclosed please find Appellant's Motion for Extension of Time to File/Serve their Initial Reply Brief in the above-referenced matter which will be filed today.

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



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FOR MORE