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Nov 18 2021

SC Court of Appeals

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

Appeal from Charleston County
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

Circuit Court 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 TO FILE/SERVE
INITIAL REPLY BRIEF OF APPELLANTS**

CLEMENT RIVERS, LLP

Stephen L. Brown (SC Bar No. 66468)

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

Russell G. Hines (SC Bar No. 72100)

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(843) 720-5488

Attorneys for Appellant

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COMES NOW Appellant Sandpiper Independent and Assisted Living-Delaware, LLC, 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 Appellants, Appellate Case No. 2020-001643]

Respectfully submitted,

CLEMENT RIVERS, LLP

By:



Stephen L. Brown (SC Bar No. 66468)

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

Russell G. Hines (SC Bar No. 72100)

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Attorneys for Appellant

Charleston, South Carolina

Dated: Nov. 18, 2021

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Appellant.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
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Attorneys for Appellant

I, Stephen L. Brown, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANTS** was served on all other parties to this appeal on November 18, 2021, via email (see attached) to their following counsel of record:

Paul L. Reeves, Esquire
Todd R. Lyle, Esquire
Reeves & Lyle, LLC
P. O. Box 11126
Columbia, SC 29211

and

John G. Boswell, Esquire
211 Hawthorne Rd
Raleigh, NC 27605

Attorneys for Respondent

Respectfully submitted,
CLEMENT RIVERS, LLP

By: _____

Stephen L. Brown (SC Bar No. 66468)

Attorneys for Appellant

Charleston, South Carolina

Dated: November 18, 2021

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Thursday, November 18, 2021 4:51 PM
To: 'Paul@ReevesandLyle.com'; 'jennifer@reevesandlyle.com';
'john.boswell.us@gmail.com'; 'todd@reevesandlyle.com'
Cc: Hines, Russell; 'Stephen Brown (sbrown@ycrlaw.com)'; Justman, Aimee; Davis, Jay
Subject: Parrott v. Sandpiper; Appellate Case No. 2020-001643
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
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