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**Dec 01 2021**

**SC Court of Appeals**

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

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Appeal from Charleston County  
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

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

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The Estate of Delila Parrott,

Respondent

v.

Sandpiper Independent and Assisted Living-Delaware, LLC,

Appellant.

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**SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE  
INITIAL REPLY BRIEF OF APPELLANTS**

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**CLEMENT RIVERS, LLP**

Stephen L. Brown (SC Bar No. 66468)

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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 additional 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, by order of this Court filed November 22, 2021, the deadline for Appellant's initial reply brief and designation of matter is Thursday, December 2, 2021. On account of work-related and other time commitments, Appellant respectfully requests that this deadline be extended by 10 days (from December 2, 2021), i.e., through December 13, 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 13, 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 page for Second 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)  
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*Attorneys for Appellant*

Charleston, South Carolina

Dated: December 1, 2021

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**PROOF OF SERVICE**

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CLEMENT RIVERS, LLP  
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*Attorneys for Appellant*

I, Stephen L. Brown, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that **SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANTS** was served on all other parties to this appeal on December 1, 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:



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Stephen L. Brown (SC Bar No. 66468)

*Attorneys for Appellant*

Charleston, South Carolina

Dated: December 1, 2021

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Wednesday, December 1, 2021 1:34 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:** 2nd Mtn for Ext of Time to File-Serve Initial Reply Brief of Appellants.pdf

Enclosed please find Appellant's Second 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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