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Dec 15 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

Appellate Case No. 2021-000586

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

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 RESPONDENT'S INITIAL BRIEF**

Pursuant to Rule 263 of the South Carolina Rules of Appellate Procedure, Respondent Mary Tisdale, as Personal Representative of the Estate of Earlene Seabrook, moves for a three-week extension of time to file his initial brief. The current deadline is December 20, 2021, and the proposed extended deadline would be January 10, 2022. Appellants' counsel consents to Respondent's request. This is Respondent's first extension request.

Respectfully submitted,

/s/ Jordan C. Calloway

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A. Stuart Hudson

Bradley H. Banyas

Hughey Law Firm, LLC

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Attorneys for Respondent

December 9, 2020

Rock Hill, SC

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Scranton Healthcare Center is Appellant.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on December 15, 2021, he served Appellants' counsel with a Notice of Appearance and Respondent's Motion for Extension at the email addresses listed below pursuant to Section (g)(3) of the South Carolina Supreme Court's March 20, 2020 order (Order No. 2020-03-20-01):

- sbrown@ycrlaw.com
- jdavis@ycrlaw.com
- rhines@ycrlaw.com
- gdotterer@ycrlaw.com
- mriddle@ycrlaw.com

/s/ Jordan C. Calloway
Attorney for Respondent

M. Tisdale v. Palmetto Lake City Operating, LLC (Appellate Case No. 2021-000586)

Jordan Calloway <jordan@mcgowanhood.com>

Wed 12/15/2021 9:30 AM

To: sbrown@ycrlaw.com <sbrown@ycrlaw.com>; Davis, Jay (jdavis@ycrlaw.com) <jdavis@ycrlaw.com>; Hines, Russell <RHines@ycrlaw.com>; gdotterer@ycrlaw.com <gdotterer@ycrlaw.com>; mmiddle@ycrlaw.com <mmiddle@ycrlaw.com>

Cc: Brad Banyas <brad@hugheylawfirm.com>; Stuart Hudson <stuart@hugheylawfirm.com>; Nate Hughey <nate@hugheylawfirm.com>

 2 attachments (116 KB)

M. Tisdale--Mtn for Extension (Initial Resp. Br.) PDF.pdf; M. Tisdale--Notice of Appearance PDF.pdf;

Counsel:

I am attaching my Notice of Appearance and Respondent's Motion for Extension that are being electronically filed today with the Court of Appeals. Pursuant to Rule 262(c)(3), SCACR and Section (d)(1) of the South Carolina Supreme Court's August 25, 2021, order (Order No. 2021-08-25-02), please consider this email as service for both documents.

Thanks,

Jordan Calloway
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