

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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Dec 13 2021

SC Court of Appeals

Appeal from Dorchester County
Court of Common Pleas

Maite Murphy, Circuit Court Judge

Case No. 2020-CP-18-01027
Appellate Case No. 2021-000594

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 DECEMBER 14, 2021,
TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANT**

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James D. Gandy, III (SC Bar No. 11925)
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Attorneys for Appellant

NOW COMES 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 this Honorable Court for an extension of one (1) more day, i.e., to Tuesday, December 14, 2021, to file/serve Appellant's initial reply brief and any additional designation of matter to be included in the record on appeal.

By order filed December 2, 2021, the Court extended the deadline for Appellant's initial reply brief to today, December 13, 2021. As it happens, today is also the deadline for the undersigned to file/serve an initial reply brief in another appeal, namely, *Parrott v. Sandpiper* (Appellate Case No. 2020-001643). Although the undersigned had in good faith expected to complete both initial reply briefs by today, on account of work-related and other time commitments (to include his need to attend to childcare issues for a period of time in the middle of his workday today) he is in need of a small amount of additional time (namely, one more (1) day, i.e., to tomorrow, Tuesday, December 14, 2021) to complete Appellant's initial reply brief in this case, and humbly submitting that the relief requested herein is warranted as an appropriately modest dispensation that is consistent with the interests of justice and will not result in any undue prejudice to Respondent or delay, he hopes the Court will deem the circumstances worthy

thereof.¹

WHEREFORE, Appellant moves for one (1) additional days' time to file/serve its initial reply brief and any additional designation of matter to be included in the record on appeal, i.e., an extension to Tuesday, December 14, 2021. Further, Appellant respectfully requests that the Court hold its present initial-reply -briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
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Attorneys for Appellant

Charleston, South Carolina

December 13, 2021

¹ Please know that the undersigned recognizes that the Court's most recent order directed to this issue (i.e., the December 2nd order) states, "No further extensions will be granted absent extraordinary circumstances," and that he does not make the instant motion lightly.

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PROOF OF SERVICE

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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 DECEMBER 14, 2021, TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANT** was served on Respondent on December 13, 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
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Charleston, South Carolina

December 13, 2021

From: [Hines, Russell](#)
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Cc: "[Brown, Steve](#)"; [Justman, Aimee](#); [Bell, Pollyana \(Polly\)](#)
Subject: Walker v. Hallmark (2021-000594) -- Appellant's Motion for Reply Brief Ext to 12-14-21
Date: Monday, December 13, 2021 11:45:36 PM
Attachments: [image001.png](#)
[Walker v. Hallmark \(2021-000594\) -- Motion for Reply Brief Ext to 12-14.pdf](#)

Attached regarding the above-referenced matter please find Appellant's **Motion For Extension Of Time To December 14, 2021, To File/Serve Initial Reply Brief Of Appellant.**

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