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Jan 18 2022

SC Court of Appeals

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

Appeal from Calhoun County
Court of Common Pleas

Honorable Maite Murphy, Circuit Court Judge

Appellate Case No. 2021-000700
Circuit Court Case No. 2019-CP-09-00220

Jeffery White, individually and as Personal Representative of the
Estate of Lizzie White,

Respondent,

v.

St. Matthews Healthcare, LLC, d/b/a Calhoun Convalescent Center,

Appellant.

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

CLEMENT RIVERS, LLP
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Attorneys for Appellant

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

COMES NOW Appellant St. Matthews Healthcare, LLC, d/b/a Calhoun Convalescent Center, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of ten (10) days' additional 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 Appellants' initial reply brief and designation of matter is today January 18, 2022. On account of work-related and other time commitments, Appellant respectfully requests that this deadline be extended by 10 days (from January 18, 2022), i.e., through January 28, 2022. Respectfully, Appellant believes that 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 additional 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 January 28, 2022, 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 Motion for Extension of Time to File/Serve Initial Reply Brief of Appellants, Appellate Case No. 2021-000700]

Respectfully submitted,

CLEMENT RIVERS, LLP

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Charleston, South Carolina

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PROOF OF SERVICE

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I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that the **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANTS** was served on all other parties to this appeal on January 18, 2022, via email (see attached) to their following counsel of record:

Jessica L. Fickling
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Attorneys for Respondent

CLEMENT RIVERS, LLP

By: *s/Russell G. Hines*
Russell G. Hines (SC Bar No. 72100)
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Charleston, South Carolina

January 18, 2022

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Tuesday, January 18, 2022 11:16 AM
To: 'jfickling@stromlaw.com'; 'jleininger@stromlaw.com'; 'MRobins@stromlaw.com'
Cc: Hines, Russell; Justman, Aimee
Subject: White v. St. Matthews Healthcare; Appellate Case No. 2021-000700
Attachments: White Motion for Ext.pdf

Enclosed please find Appellant's Motion for Extension of Time to File/Serve their Initial Reply Brief which will be filed today with the Court of Appeals.

Thank you,

Pollyana Bell
Project Assistant
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