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Jan 28 2022

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

Case No. 2020-CP-21-02290

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

Respondent,

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/SERVE INITIAL REPLY BRIEF OF APPELLANT**

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
Matthew O. Riddle (SC Bar No. 76650)
Russell G. Hines (SC Bar No. 72100)
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(843) 720-5488
Attorneys for Appellant

COMES NOW Appellant, Palmetto Lake City Operating, LLC d/b/a Lake City-Scranton Healthcare 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, by order of this Court filed January 20, 2022, the deadline for Appellants' initial reply brief and designation of matter is today, January 28, 2022. On account of work-related and other time commitments, Appellant respectfully requests that this deadline be extended by 10 days (from January 28, 2022), i.e., through February 7, 2022. 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 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 February 7, 2022, according to the undersigned's calculations. Further, Appellant respectfully requests that the Court hold the present initial-reply-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. 2021-000586]*

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
Matthew O. Riddle (SC Bar No. 76650)
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Charleston, South Carolina

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Appellant.

PROOF OF SERVICE

CLEMENT RIVERS, LLP

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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 FILE/SERVE INITIAL REPLY BRIEF OF APPELLANT** was served on Respondent, Mary Tisdale, as Personal Representative of the Estate of Earlene Seabrook, on January 28, 2022, by emailing (see attached) a copy of the same to Respondent's counsel of record:

D. Nathan Hughey, Esquire
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A. Stuart Hudson, Esquire
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Attorneys for Respondent

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines (SC Bar No. 72100)

Attorneys for Appellant

Charleston, South Carolina

January 28, 2022

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Friday, January 28, 2022 11:11 AM
To: 'nate@hugheyfirm.com'; 'stuart@hugheyfirm.com'; 'Brad Banyas';
'Jennifer@hugheyfirm.com'; 'jordan@hugheyfirm.com'
Cc: Hines, Russell; Justman, Aimee
Subject: Appellate Case No. 2021-000586; Tisdale v. Palmetto Lake City
Attachments: Tisdale Mtn for Ext of Time for Initial Reply Brief.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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