

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

RECEIVED

Apr 29 2022

S.C. SUPREME COURT

Appeal from Oconee County
Court of Common Pleas

R. Scott Sprouse, Circuit Court Judge

Case No. 2018-CP-37-00271
Appellate Case No. 2022-000100
Opinion No. 5866 (S.C. Ct. App. Filed October 6, 2021)

Stephanie Underwood, as Personal Representative of the Estate of
Betty Herrington,

Petitioner,

v.

SSC Seneca Operating Company, LLC,
d/b/a Seneca Health & Rehabilitation Center; SavaSeniorCare,
LLC; SSC Equity Holdings, LLC; SavaSeniorCare Administrative
Services, LLC; SavaSeniorCare Consulting Services, LLC,

Defendants,

Of whom SSC Seneca Operating Company, LLC,
d/b/a Seneca Health & Rehabilitation Center; SavaSeniorCare
Administrative Services, LLC; and SavaSeniorCare Consulting
Services, LLC, are

Respondents.

**MOTION FOR EXTENSION OF TIME TO SERVE/FILE
RETURN TO PETITION FOR WRIT OF CERTIORARI**

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
D. Jay Davis, Jr. (SC Bar No. 12084)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29402
P.O. Box 993 (29402)
843-720-5488

Attorneys for Respondents

NOW COME Respondents, SSC Seneca Operating Company, LLC, d/b/a Seneca Health & Rehabilitation Center, SavaSeniorCare Administrative Services, LLC, and SavaSeniorCare Consulting Services, LLC, by and through their undersigned counsel, on the grounds stated below, pursuant to Rule 263(b), SCACR, as well as the Court's order of July 16, 2014, regarding Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals, and hereby move for an extension of ten (10) days' time to file/serve their return to the petition for writ of certiorari in this matter.

Presently, in accordance with Rule 247(f), SCACR, the deadline for Respondents' return to petition for writ of certiorari is today, April 29, 2022. Due to other time commitments, both work- and non-work-related, the undersigned counsel for Respondents requests ten (10) additional days, beyond today's date, to prepare Respondents' return to petition, and the undersigned humbly submits that there is good cause to allow the requested dispensation: It is in furtherance of the interests of justice; it will not work any undue prejudice upon any other party; and it is consistent with the extension protocol established by the Court's aforementioned order of July 16, 2014.

WHEREFORE, Respondents respectfully request that this Honorable Court grant them an extension of ten (10) days' time to file/serve their return to petition for writ of certiorari. With the extension requested herein, the new deadline for

filing/serving their return to the petition for writ of certiorari would be May 9, 2022, according to the undersigned's calculations. Further, Respondents respectfully request that the Court hold this present deadline in abeyance until it acts upon this motion.

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)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29402
P.O. Box 993 (29402)
843-720-5488
Attorneys for Respondents

Charleston, South Carolina

April 29, 2022