

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

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Appeal from Oconee County  
Court of Common Pleas

R. Scott Sprouse, Circuit Court Judge

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

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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.

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**PROOF OF SERVICE**

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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)  
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*Attorneys for Respondents*

**RECEIVED**

**Apr 29 2022**

**S.C. SUPREME COURT**

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Respondents, hereby certify that the **MOTION FOR EXTENSION OF TIME TO SERVE/FILE RETURN TO PETITION FOR WRIT OF CERTIORARI** was served on all other parties to this appeal on April 29, 2022, via email (see attached) to their following counsel of record:

Raymond T. Wooten, Esquire  
Smith, Jordan & Lavery, P.A.  
1810 East Main Street  
Easley, SC 29640  
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*Attorneys for Petitioner Stephanie Underwood,  
as Personal Representative of the Estate of Betty Herrington*

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: *s/Russell G. Hines*  
Russell G. Hines (SC Bar No. 72100)  
*Attorneys for Respondents*

Charleston, South Carolina

April 29, 2022

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Friday, April 29, 2022 11:40 AM  
**To:** 'wooten@smithjordan.com'  
**Cc:** Hines, Russell; Justman, Aimee  
**Subject:** Underwood v. SSC Seneca ; Appellate Case No. 2022-000100  
**Attachments:** Motion for Ext for Return to Petition for Writ.pdf

Enclosed please find Respondents' Motion for Extension of Time to Serve/File their Return to Petition for Writ of Certiorari which will be filed today in the above-referenced matter.

Thank you,

Pollyana Bell  
Project Assistant  
Commercial Litigation Practice Group  
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