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May 05 2022

SC Court of Appeals

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

Appeal from Charleston County
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

Appellate Case No. 2019-001413
Circuit Court Case No. 2018-CP-10-01251

Richard Ladson, Jr.,
by and through Richard Miles Ladson, Sr., POA,

Respondent,

v.

THI of South Carolina at Charleston, LLC
d/b/a Riverside Health and Rehab,

Appellant.

**MOTION FOR EXTENSION OF TIME
TO PETITION FOR REHEARING**

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 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Appellant

COMES NOW Appellant, THI of South Carolina at Charleston, LLC d/b/a Riverside Health and Rehab, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an additional extension of fifteen (15) days' additional time to file/serve a petition for rehearing of this matter, which the Court decided via opinion filed April 6, 2022. *See Estate of Ladson v. THI Of S.C. at Charleston, LLC*, Unpublished Op. No. 2022-UP-169.

Presently, by order of this Court filed April 22, 2022, the deadline for Appellant's petition for rehearing is May 6, 2022. Because of work-related and other time commitments, the undersigned counsel for Appellant requests the Court's allowance of fifteen (15) days' additional time to petition for rehearing.

Respectfully, the undersigned submits there is good cause for the Court to grant the relief requested herein, as it is, under the circumstances, a reasonable dispensation, timely sought, consistent with the interests of justice, posing no threat of undue prejudice to any other party.

WHEREFORE, Appellant requests that the Court grant it an extension of 15 days' time (running from May 6, 2022) to petition for rehearing. By the undersigned's calculations, the grant of this relief would make the new deadline to petition for rehearing May 23, 2022. ADDITIONALLY, for the same reasons set forth in support of the within request for an extension of time, Appellant requests

that the Court hold the present deadline for petitioning for rehearing in abeyance until the Court acts on this motion.

*[Signature page for Motion for Extension of Time to Petition for Rehearing,
Appellate Case No. 2019-001413]*

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)
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Attorneys for Appellant

Charleston, South Carolina

May 5, 2022

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Richard Ladson, Jr.,
by and through Richard Miles Ladson, Sr., POA,

Respondent,

v.

THI of South Carolina at Charleston, LLC
d/b/a Riverside Health and Rehab,

Appellant.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
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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 PETITION FOR REHEARING** was served on Respondent, on May 5, 2022, by emailing (see attached) a copy of the same to Respondent's counsel of record:

Carl E. Pierce, II, Esquire
Benjamin C. Smoot, II, Esquire
PIERCE, HERNS, SLOAN & WILSON, LLC
321 East Bay Street
Charleston, South Carolina 29401
carlpierce@piercesloan.com
bensmoot@piercesloan.com

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

May 5, 2022

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Thursday, May 5, 2022 2:38 PM
To: 'carlpierce@piercesloan.com'; 'bensmoot@piercesloan.com'
Cc: Hines, Russell; Justman, Aimee
Subject: Ladson v. THI ; Appellate Case No. 2019-001413
Attachments: Mtn for Ext to Petition for Rehearing.pdf

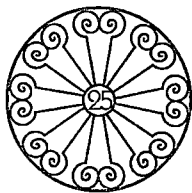
Enclosed please find Appellant's Motion for Extension of Time to Petition for Rehearing in the above-referenced matter which will be filed today.

Thank you,

Pollyana Bell
Project Assistant
Commercial Litigation Practice Group
Phone:(843)720-5488 | Fax:(843)579-1369



CLEMENT RIVERS, LLP
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CLEMENT RIVERS, LLP
ATTORNEYS AT LAW

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May 6, 2022

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VIA US MAIL

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

SC Court of Appeals

Re: Richard Ladson v. THI of South Carolina at Charleston
Appellate Case No. 2019-001413
Case No.: 2018-CP-10-01251
YCR File: 14347-20170914

Dear Ms. Kitchings:

Enclosed please find our firm's check representing the filing fee for Appellant's Motion for Extension of Time to Petition for Rehearing, which was electronically filed on May 5, 2022, in the above-referenced matter.

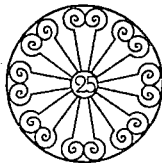
With best wishes and kindest regards, I am

Sincerely,

CLEMENT RIVERS, LLP

Pollyana Bell
Project Assistant

/pbb
Enclosures



CLEMENT RIVERS, LLP

P.O. Box 993
Charleston, SC 29402

quadrant

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Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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SC Court of Appeals

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