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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 REPLY TO THE
RETURN TO THE 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
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(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, SCACR, and moves for an additional extension of five (5) days' additional time to file/serve a reply to the return to the 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 *See Estate of Ladson v. THI Of S.C. at Charleston, LLC*, Unpublished Op.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, in accordance with Rule 240(f), the deadline for Appellant's reply to the return to the petition for rehearing is today, June 8, 2022. Because of work-related and other time commitments, the undersigned counsel for Appellant requests the Court's allowance of five (5) days' additional time to reply to the return to the 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 5 days' time (running from June 8, 2022) to petition for rehearing. By the undersigned's calculations, the grant of this relief would make the new deadline to petition for rehearing June 15, 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 to reply to the return to the petition for rehearing in abeyance until the Court acts on this motion.

[Signature page for Motion for Extension of Time to Reply to the Return to the 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)
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Attorneys for Appellant

Charleston, South Carolina

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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 REPLY TO THE RETURN TO THE PETITION FOR REHEARING** was served on Respondent, on June 8, 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
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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

June 8, 2022

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Wednesday, June 8, 2022 9:53 AM
To: 'carlpierce@piercesloan.com'; 'bensmoot@piercesloan.com';
'treypierce@piercesloan.com'
Cc: Hines, Russell; Justman, Aimee
Subject: Ladson v. THI ; Appellate Case No. 2019-001413
Attachments: Mtn for Ext to Reply to Return to Petition for Rehearing.pdf

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

Thank you,

Pollyana Bell
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