

**RECEIVED**

**Mar 22 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM YORK COUNTY  
Court of Common Pleas

D. Craig Brown, Circuit Court Judge  
William B. McKinnon, Circuit Court Judge

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Appellate Case No. 2022-000288

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Angela Patton, as Next Friend of Alexia L., a minor, ..... Respondent,

v.

Dr. Gregory A. Miller and Rock Hill Gynecological & Obstetrical Associates, P.A.,..... Appellants.

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RESPONDENT’S MOTION FOR EXTENSION OF TIME

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Respondent hereby moves for a 30-day extension of time to file her initial brief. The Initial Brief of Appellants was filed and served upon Respondent on January 23, 2023, making Respondent’s original deadline February 22, 2023. Counsel for Respondent was granted an initial 30-day extension until March 24, 2023, by Order dated February 21, 2023. Counsel will be unable to meet this deadline due to other professional obligations and commitments, including court hearings, mediations, depositions and travel. In order to adequately prepare this Brief, Respondent seeks leave of this Court for a second 30-day extension to file her Initial Brief. As this second 30-day extension would fall on Sunday, April 23, 2023, the effective new deadline would be the following day, Monday, April 24, 2023.

Allowing the requested extension until April 24, 2023, will not prejudice Appellants. Respondent requests the Court to extend the deadline for filing of her Brief accordingly, to April 24, 2023.

Respectfully submitted,

Anderson, South Carolina  
March 22, 2023

GRAHAM LAW FIRM, P.A.

By: s/Edward L. Graham  
Edward L. Graham  
Graham Law Firm  
120 Donald Drive  
Pendleton, SC

D. Bradley Jordan  
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Rock Hill, SC 29730

Attorneys for Respondent

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Dr. Gregory A. Miller and Rock Hill Gynecological & Obstetrical  
Associates, P.A., ..... Appellants

**PROOF OF SERVICE**

I, the undersigned Paralegal of the law offices of Graham Law Firm, P.A., Attorneys for Angela Patton, as Next Friend of Alexia L., a minor do hereby certify that on March 22, 2023, I served all counsel in this action with a copy of the pleading(s) hereinbelow by emailing a copy to each attorney listed below using their primary email address listed in the Attorney Information System.

Pleadings Served: **RESPONDENTS'S MOTION FOR EXTENSION OF TIME TO FILE BRIEF**

Counsel Served: Ashby W. Davis, Esquire  
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Eugene B Benton  
Eugene B. Benton

## Eugene Benton

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**From:** Eugene Benton  
**Sent:** Wednesday, March 22, 2023 10:15 AM  
**To:** 'mitch.brown@nelsonmullins.com'; 'nick.charles@nelsonmullins.com';  
'adavis@davisnyder.com'; Edward Graham; 'bradjordan@comporium.net'  
**Cc:** 'eileen.hindman@nelsonmullins.com'; 'jessica.trautman@nelsonmullins.com';  
'susie@jordanlawfirm.com'  
**Subject:** RE: Angela Patton v. Dr. Gregory A. Miller (2) 2022-000288  
**Attachments:** 30 day Ext re Filing Initial Brief 3-22-23.pdf; Proof of Service-Resp Mot for Ext  
3-22-23.pdf

Attached for service upon you in the above matter Respondent's Motion for Extension and Proof of Service. Service is made via email pursuant to the Supreme Court Order 2021-08-25-02.

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