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SMYTH WHITLEY, LLC
ATTORNEYS AT LAW

S.C. SUPREME COURT

March 27, 2023

VIA EMAIL (supctfilings@sccourts.org)

Patricia A. Howard
Clerk of Court

Re: Jeane Whitfield v. Dennis K. Schimpf and Sweetgrass Plastic Surgery, LLC
Appellate Case No. 2023-000245

Dear Ms. Howard:

Enclosed for service, please find Respondents' request for a seven (7) day extension to file their late Return to Petition, which was originally due on March 20, 2023. As detailed in our Motion, Respondents seek a brief extension to file their Return by this Monday, April 3, 2023. Please contact me with any questions or concerns. Our \$50.00 filing fee is being sent via U.S. Mail tomorrow. We sincerely appreciate your consideration of our Motion.

With warm personal regards, I remain,

Very truly yours,

A handwritten signature in black ink that reads 'Todd W. Smyth'.

Todd W. Smyth

Enclosures (as stated)

cc: All counsel of record

Todd W. Smyth

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THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

Appellate Case No. 2023-000245

Jeane Whitfield,

Appellant,

v.

Dennis K. Schimpf, M.D. and
Sweetgrass Plastic Surgery, LLC,

Respondents.

**RESPONDENTS DENNIS K. SCHIMPF, M.D.
AND SWEETGRASS PLASTIC SURGERY, LLC'S MOTION FOR EXTENSION OF
TIME AND/OR FOR ACCEPTANCE OF A LATE FILING**

Pursuant to Rule 263(b) of the South Carolina Rules of Appellate Procedure, Respondents Dennis K. Schimpf and Sweetgrass Plastic Surgery, LLC (collectively, "Respondents") move this Honorable Court for an extension of time within which to prepare their Return to Petition ("Return") and/or for acceptance of their late Return. This is Respondents' first motion for an enlargement of any time. In support of their Motion, Respondents submit:

1. On February 17, 2023, Petitioner timely filed and served her Petition for a Writ of Certiorari.
2. On February 23, 2023, the parties received the Clerk's initial letter.

3. As a result of the above, Respondents' Return was due on March 20, 2023.
4. Respondents have been diligently working on their Return. However, due to the press of other litigation matters, including two jury trials, Respondents need additional time to prepare and file their Return.
5. Accordingly, Respondents request an additional seven (7) days to file their Return, or until Monday, April 3, 2023. Respondents do not make this Motion for the purpose of prejudice or needless delay and believe that their Return will promote a more efficient judicial resolution of this matter.

WHEREFORE, having fully set forth the grounds for the Motion, Respondents move for an Order allowing Respondents to file a late Return by Monday, April 3, 2023.

Respectfully submitted,



Todd W. Smyth

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Attorneys for Respondents

March 27, 2023

Charleston, South Carolina

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PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time and/or for Acceptance of a Late Filing on Petitioner Jeane Whitfield electronically on March 27, 2023 to all counsel of record as listed below:

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March 27, 2023
Charleston, South Carolina