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May 01 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Maite Murphy, Circuit Court Judge

Appellate Case No. 2023-000029
Circuit Court Case No. 2018-CP-10-02109

Rebecca Turisk,

Appellant,

v.

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

Respondents.

RESPONDENTS' MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

Respondents Dennis K. Schimpf, M.D. and Sweetgrass Plastic Surgery, LLC (collectively, "Respondents"), move this Honorable Court for an extension of time within which to prepare their Initial Brief. This is Respondents' first motion for an extension of time. In support of their Motion, Respondents submit:

1. On January 9, 2023, Appellant filed and served its Notice of Appeal.
2. On January 25, 2023, this Honorable Court granted Appellant's first motion for an extension of time to file its Initial Brief and Designation of Matter to March 10, 2023.

3. On February 27, 2023, this Honorable Court granted Appellant's second motion for an extension of time to file its Initial Brief and Designation of Matter to April 10, 2023.
4. On April 10, 2023, Appellant filed and served its Initial Brief and Designation of Matter. As a result, Respondents' Initial Brief is now due on May 10, 2023, which is a Saturday.
5. Due to the press of other litigation matters, Respondents need additional time to prepare and file their Initial Brief. Respondents do not make this Motion for the purpose of prejudice or needless delay and believe that the extension will enable Respondents to file an Initial Brief that will promote a more efficient judicial resolution of this matter.
6. Accordingly, Respondents request an additional thirty-two (32) days to file their Initial Brief, or until Monday, June 12, 2023.

WHEREFORE, having fully set forth the grounds for the Motion, Respondents move for an Order granting an extension of time of thirty-two (32) days from May 10, 2023, to file their Initial Brief, so that it is due to be filed and served no later than June 12, 2023.

Respectfully submitted,

s/Todd W. Smyth

Todd W. Smyth

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Attorneys for Respondents

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

Respondents.

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time on Appellant Rebecca Turisk electronically on May 1, 2023 to all counsel of record as listed below:

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Attorneys for Respondents



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ATTORNEYS AT LAW

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VIA EMAIL ONLY

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

Re: Rebecca Turisk v. Dennis K. Schimpf, M.D., et al.
Appellate Case No.: 2023-000029

Dear Ms. Kitchings:

Enclosed for service, please find Respondents' request for a thirty-two (32) day extension of time to file their Initial Brief, which was originally due on Saturday, May 10, 2023. As detailed in our Motion, Respondents seek a brief extension to file their Initial Brief by Monday, June 12, 2023. Please contact me with any questions or concerns. Our \$50.00 filing fee is being sent via U.S. Mail. We sincerely appreciate your consideration of our Motion.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Todd'.

Todd W. Smyth

TWS:cmr
Enclosure

cc: all counsel of record (via email only)

Todd W. Smyth

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