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Jun 10 2024

SC Court of Appeals

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June 10, 2024

VIA EMAIL: ctappfilings@sccourts.org

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

**RE: Debra A. Wilson v. NHC Homecare Midlands
Appellate Case No: 2024-00038**

Dear Ms. Kitchings:

After drafting this, and trying to get things out in the three days I have left, I just realized that they filed a Motion to Dismiss, which will stay briefing, but I still wanted to go ahead and put this letter in place in case something happens over the next few weeks concerning that Motion:

This is to request an extension for filing of the Reply Brief in the above-referenced matter. Due to my current health situation, I need to ask for an extension at the discretion of the Court contrary to the normal extension granted. Enclosed is the required filing fee for making this request.

Last week it was determined that I need an aortic valve replacement and I have just gone through a catheterization for mapping, sizing, and to ensure that nothing else was going on with my heart. I am scheduled for the aortic valve replacement on June 13th. I know that I will be in the hospital in the ICU for one to two days and that thereafter I will be restricted for at least seven days unable to drive or lift anything, and with other restrictions yet to be determined by my doctors. Following that, I will be on, for lack of a better term, limited duty. Of course, I have a tremendous case load and numerous other things

pending in the Court of Appeals, Supreme Court, and before the Commission which I will be trying to address during any limited time back in the office.

I know that I will be recuperating through the week of the 4th of July and if I was to request an extension of just a month from the date the Motion was filed, that would require the Reply Brief to be filed on July 5th.

So, while I would appreciate it if the Court would consider, in these circumstances, granting me an extension of 60 days to file the Reply Brief, I hope that the Court will be gracious enough to grant me an extension following the week of July 4th of 14 days making the Reply Brief due on or before July 22nd. I promise what extension the Court allows, I will file the reply as soon as I can.

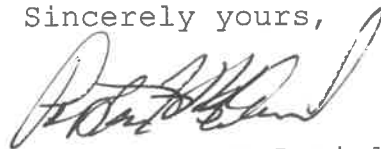
To compound matters, and just for the Court's information, my Chief Paralegal of over 25 years who does all of my Appellate work, including all of my briefing, scheduling, Motions, and everything, on April 21st had to have emergency gallbladder surgery when her gallbladder exploded, spilling bile all throughout her abdomen, and after which she not only had sepsis but was on IV antibiotics for four weeks and with fluid surrounding her lung. So she is still not back in the office but will be able to return June 17th. Of course, lucky me, I will be out for the aortic valve replacement.

Any courtesy that the Court can extend me will be greatly appreciated and I will try my best to comply with any timing that the Court requires.

As always, I appreciate all of the kindnesses and courtesies shown to me and my clients by you, your office, and the Court.

By copy of this letter I am notifying Clarke McCants of my communication and request.

Sincerely yours,



Preston F. McDaniel

PFM/kecs
Enclosures

cc: Kenneth M. Mathews, Esquire
Clarke W. McCants, III, Esquire