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Jun 28 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM HORRY COUNTY
Court of Common Pleas

The Honorable Clifton Newman, Circuit Court Judge
Case No. 2018-CP-26-01626

Appellate Case No. 2024-000070

Mark Conard and Intercoastal Endo., P.C., Respondents

vs.

Wade Nichols, Wade Nichols D.M.D. P.A. and Nichols Holdings, LLC Appellants

**MOTION FOR EXTENSION OF TIME TO FILE APPELLANTS’
INITIAL BRIEF AND DESIGNATION OF MATTER**

YOU WILL PLEASE TAKE NOTICE that the undersigned, as attorney for Appellants Wade Nichols, Wade Nichols D.M.D. P.A. and Nichols Holdings, LLC, moves this Court for an Order extending the time to file Appellant’s Initial Brief and Designation of Matter currently due on July 1, 2024 in the captioned appeal. The basis of this motion is that Appellants’ counsel recently had an unexpected death in his immediate family and has been out of the office and unable to fully brief this matter at this time.

WHEREFORE, Appellants’ counsel respectfully requests this Court issue its Order granting an extension up to and including July 31, 2024 to file Appellants’ Initial Brief and Designation of Matter. This is Appellants’ second request for extension in this matter and is made in good faith and not for purposes of delay.

Respectfully submitted,

KELAHER, CONNELL & CONNOR, P.C.



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Attorneys for Appellants

June 28, 2024
Surfside Beach, South Carolina

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PROOF OF SERVICE

PERSONALLY appeared before me, Shelia Y. McCumbee, who being duly sworn, deposes and says that she is an employee of Kelaher, Connell & Connor, P.C., and that she has served a copy of **Motion for Extension of Time to File Appellant’s Initial Brief and Designation of Matter** on the 28th day of June 2024, by depositing a copy of same in the United States Mail, postage prepaid, to:

Natasha M. Hanna, Esquire
Hala Sadek, Esquire
Law Office of Natasha M. Hanna, P.C.
4712 Jenn Drive Suite A
Myrtle Beach, SC 29577

Shelia Y. McCumbee
Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,
this 28th day of June, 2024.

Barbara A. Smith
Notary Public for South Carolina
My Commission Expires: 1-24-34

KELAHER, CONNELL & CONNOR, P.C.
ATTORNEYS AT LAW
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THE COURTYARD
1500 U.S. HIGHWAY 17 NORTH
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June 28, 2024

ctappfilings@sccourts.org

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

Re: Appellate Case No. 2024-000070
Mark Conard and Intercoastal Endo, P.C. v. Wade Nichols, et al.
C/A No. 2018-CP-26-01626
Our File No. 2014-0299C

Dear Ms. Kitchings:

Enclosed please find Appellant's Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter and Proof of Service in the above-captioned matter. Our check for the \$50.00 filing fee is being mailed this date.

By copy of this letter, we hereby serve Appellants' Motion for Extension on counsel of record.

Should you have any question or need anything further at this time, please do not hesitate to contact me.

Sincerely yours,


Gene M. Connell, Jr.

GMC,Jr.:sm
Enclosures
cc w/enc.:

Natasha M. Hanna, Esquire
Hala Sadek, Esquire