

RECEIVED

Nov 13 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

J. Mark Hayes, II, Circuit Court Judge

Appellate Case No.: 2024-001546
Case No. 2017-CP-42-00219

Jo Ann Blackwell, Michelene Brooks, and Samuel H. Owens, Jr., individually and on behalf of all others similarly situated,

Respondents,

v.

Mary Black Health System, LLC, d/b/a Mary Black Memorial Hospital; CHSPSC, LLC; and Professional Account Services, Inc.,

Appellants,

APPELLANTS' SECOND MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

Appellants Mary Black Health System, LLC, d/b/a Mary Black Memorial Hospital; CHSPSC, LLC; Professional Account Services, Inc. (collectively, "Appellants") pursuant to 240(a), SCACR, respectfully request an extension of time of thirty (30) days within which to file their Initial Briefs and Designations of Matter to be Included in the Record on Appeal. Appellants' current deadline for serving and filing their Initial Briefs and Designations of Matter is Wednesday, December 4, 2024.

This is Appellants' second motion requesting an extension of time to file their Initial Briefs and Designations of Matter to be Included in the Record on Appeal.

As a result of Appellants' counsels' work schedule, Appellants respectfully contend that good cause exists for an extension of time to file their Initial Briefs and Designations of Matter to be Included in the Record on Appeal. In addition, good cause exists for an extension of time because lead counsel for Appellants is experiencing serious health issues and is receiving medical treatment.¹

For these reasons, Appellants respectfully contend that good cause exists for an extension of time to file their Initial Briefs and Designations of Matter to be Included in the Record on Appeal.

WHEREFORE, Appellants respectfully request an order granting an extension of thirty (30) days to file their Initial Briefs and Designations of Matter to be Included in the Record on Appeal, up to and including Friday, January 3, 2025.

s/Katon E. Dawson Jr.

James Lynn Werner, (SC Bar No. 6029)
Katon E. Dawson, Jr. (SC Bar No. 101167)
Parker Poe Adams & Bernstein LLP
1221 Main Street, Suite 1100
Columbia, SC 29201
(803) 255-8000
jimwerner@parkerpoe.com
katondawson@parkerpoe.com

*Attorneys for Appellants Mary Black Health System, LLC,
d/b/a Mary Black Memorial Hospital; CHSPSC, LLC; and
Professional Account Services, Inc.*

November 13, 2024
Columbia, South Carolina

¹ This is an ongoing issue, the resolution, and timing of which is uncertain, which may result in a further request for an extensions.

RECEIVED

Nov 13 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

J. Mark Hayes, II, Circuit Court Judge

Case No. 2017-CP-42-00219
Appellate Case No. 2024-001546

Jo Ann Blackwell, Michelene Brooks, and Samuel H. Owens, Jr., individually and on behalf of all others similarly situated,

Respondents,

v.

Mary Black Health System, LLC, d/b/a Mary Black Memorial Hospital; CHSPSC, LLC; and Professional Account Services, Inc.,

Appellants,

PROOF OF SERVICE

The undersigned hereby certifies that on November 13, 2024, a copy of **Appellants' Second Motion for Extension of Time to File Initial Brief and Designation of Matter to be included in Record on Appeal** was served on all counsel of record via email containing the above referenced document to counsels' individual AIS email addresses as follows:

John B. White, Jr. (S.C. Bar No. 5996)
Marghretta H. Shisko (S.C. Bar No. 100106)
Griffin L. Lynch (S.C. Bar No. 72518)
John B. White, Jr. P.A.
291 S. Pine Street
P.O. Box 2465 (29304)
Spartanburg, SC 29302
jwhite@johnbwhitelaw.com
mshisko@johnbwhitelaw.com
glynch@johnbwhitelaw.com

John S. Simmons (S.C. Bar No. 10260)
Rachel G. Peavy (S.C. Bar No. 69397)
Simmons Law Firm, LLC
1711 Pickens Street
Columbia, SC 29201
(803) 779-4600
jsimmons@simmonsfirm.com
rpeavy@simmonsfirm.com

*Attorneys for Respondents Jo Ann
Blackwell, Michelene Brooks, and Samuel
H. Owens, Jr.*

PARKER POE ADAMS & BERNSTEIN LLP

s/Katon E. Dawson Jr.

James Lynn Werner, (SC Bar No. 6029)
Katon E. Dawson, Jr. (SC Bar No. 101167)
Parker Poe Adams & Bernstein LLP
1221 Main Street, Suite 1100
Columbia, SC 29201
(803) 255-8000
jimwerner@parkerpoe.com
katondawson@parkerpoe.com

*Attorneys for Appellants Mary Black Health System, LLC,
d/b/a Mary Black Memorial Hospital; CHSPSC, LLC; and
Professional Account Services, Inc.*

November 13, 2024
Columbia, South Carolina