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Nov 22 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

C.A. No. 2017-CP-42-00219

Appellate Case No. 2020-001613

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.

**RESPONDENTS’ MOTION FOR EXTENSION OF TIME
TO FILE RETURN TO APPELLANTS’ PETITION FOR REHEARING**

Respondents Jo Ann Blackwell, Michelene Brooks, and Samuel H. Owens, Jr., individually and on behalf of all others similarly situated (collectively “Respondents”), hereby move the Court, pursuant to Rule 240 of the South Carolina Appellate Court Rules, for an extension of time of fourteen (14) days to submit Respondents’ Return to Appellants’ Petition for Rehearing. In its letter of November 21, 2024, this Court requested that Respondents submit a Return within ten days, which results in the Return being due on December 2, 2024. With a ten-day extension, the new deadline for Respondents’ Return would be December 16, 2024. This is Respondents’ first request for an extension of this deadline.

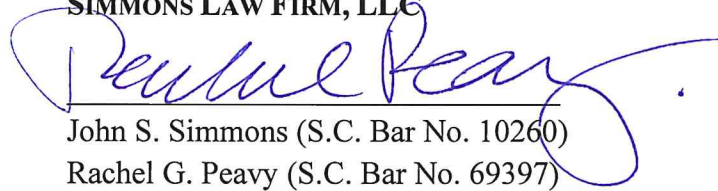
Respondents request this extension because of scheduling issues, professional obligations of counsel, the upcoming Thanksgiving holiday, and Appellants’ argument in their Petition concerning

this Court's recent decision in *Bennett v. ACS Primary Care Physicians-Southeast P.C.*, Appellate Case No. 2021-001342. Respondents respectfully believe that good cause for such an extension exists, and counsel for Appellants has consented to this request.

Respondents also request that the current deadline be held in abeyance until this Court issues an order on this motion.

Respectfully submitted,

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Attorneys for Respondents

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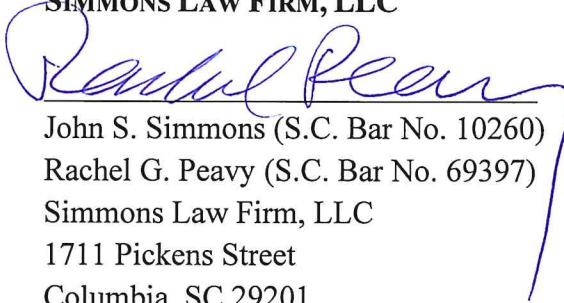
PROOF OF SERVICE

I certify that a true copy of Respondent’s Motion for Extension of Time to File Return to Appellants’ Petition for Rehearing has been served on the following, this 22nd day of November, 2024, by emailing a copy to each attorney listed below using their primary email address listed in the Attorney Information System pursuant to Rule 262(c)(3), SCACR, and *RE: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended April 24, 2024)*, S.C. Sup. Ct. Order dated April 24, 2024.

Counsel served: Katon Edwards Dawson, Jr. (katondawson@parkerpoe.com)
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