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Feb 18 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

Appellate Case No. 2024-001042

Novant Health, Inc. Terracon Consultants, Inc., Panther Heating and Cooling, Inc., Modern Construction of South Carolina, LLC, Southern Realty, LLC, and, in their individual capacities, George White, MD, Nicholas Tuttle, MD, and Malcolm Marion, MD,..... Appellant,

v.

Rachel Sanders, Respondents.

**RESPONDENTS' MOTION FOR EXTENSION
TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER**

Pursuant to Rule 263(b), SCACR, Respondents move for an extension of time to file and serve the Initial Brief and Designation of Matter for Respondents.

Pursuant to this Court's Order dated January 13, 2025, the time for serving and filing runs February 12, 2025.

Respondents respectfully request that the Court grant an extension due to professional and personal obligations. Unless otherwise ordered, a thirty-day extension would extend the time for serving and filing to March 14, 2025.

Respectfully submitted,

February 17, 2025

s/ John S. Nichols
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Attorneys for Respondent

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Novant Health, Inc. Terracon Consultants, Inc., Panther Heating and Cooling, Inc., Modern Construction of South Carolina, LLC, Southern Realty, LLC, and, in their individual capacities, George White, MD, Nicholas Tuttle, MD, and Malcolm Marion, MD, Appellants,

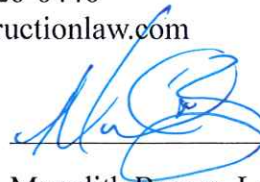
v.

Rachel Sanders, Respondents.

PROOF OF SERVICE

I certify that I have served a copy of the Notice of Appearance and Motion for Extension of Time to File and Serve Initial Brief and Designation of Matter for the Respondents to be included in the Record on Appeal upon Appellants' counsel's primary email address listed in the Attorney Information System:

Don R. Terry
S.C. Bar No. 101395
150 Milestone Way, Suite C
Greenville, SC 29615
Telephone (864) 520-4847
Facsimile (704) 626-6446
Email: dterry@wtbconstructionlaw.com



Meredith Brown, Legal Assistant
Bluestein Thompson Sullivan, LLC

February 17, 2025

Meredith Brown

From: Meredith Brown
Sent: Monday, February 17, 2025 3:43 PM
To: dterry@wtbconstructionlaw.com; dtommygist@yahoo.com; ericamccrea@gistlawfirm.com; Kyle T. Watson; John Nichols
Subject: Case No: 2024-001042- Novant Health, Inc. v Rachel Sanders
Attachments: 2025.02.17- Respondents Motion for Extension.pdf; 2025.02.17- JSN- Notice of Appearance.pdf

Dear Counsel,

Please find enclosed the Motion for Extension on behalf of Respondent. Also, see enclosed the Notice of Appearance for John S. Nichols as counsel for the Respondent.

If anything else is needed, please do not hesitate to reach out.

Thank you,
Meredith



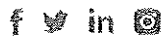
**MEREDITH BROWN OFFICE MANAGER &
LEGAL ASSISTANT TO JOHN S. NICHOLS**

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February 17, 2025

VIA EMAIL ONLY- ctappfilings@sccourts.org

The Honorable Jenny A. Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

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Feb 18 2025

SC Court of Appeals

RE: Novant Health, Inc. Terracon Consultants, Inc., Panther Heating and Cooling, Inc., Modern Construction of South Carolina, LLC, Southern Realty, LLC, and, in their individual capacities, George White, MD, Nicholas Tuttle, MD, and Malcolm Marion, MD v. Rachel Sanders.

Appellate Case No.: 2024-001042

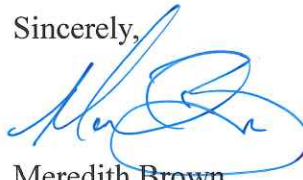
Dear Ms. Kitchings,

Please note John S. Nichols, Notice of Appearance in the above- referenced matter.

Please find enclosed for filing the original Motion for Extension in reference to the above matter. I have enclosed a proof of service of this document on counsel for the Respondent. The \$50.00 filing fee check will be delivered within five (5) days of this letter by USPS mail.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Meredith Brown
Legal Assistant to John S. Nichols
Bluestein Thompson Sullivan, LLC

/mb

Enclosures

cc: Don R. Terry (dterry@wtbconstructionlaw.com)
John Nichols (john@bluesteinattorneys.com)
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