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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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. 2025-000346

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., Petitioners.

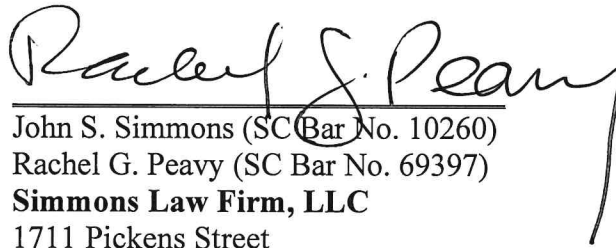
**RESPONDENTS’ MOTION FOR EXTENSION OF TIME TO FILE
RETURN TO PETITIONERS’ PETITION FOR A WRIT OF CERTIORARI**

Respondents Jo Ann Blackwell, Michelene Brooks, and Samuel H. Owens, Jr., individually and on behalf of all those similarly situated, pursuant to Rule 240(a) of the South Carolina Appellate Court Rules, respectfully request an extension of time of ten days to file their return to Petitioners’ Petition for a Writ of Certiorari to review the decision of the Court of Appeals. This is Respondents’ first request for an extension to this Court, and Respondents do not anticipate the need for an additional extension to file their return. Additionally, counsel for Respondents sought the consent of James L. Werner and Katon E. Dawson, Jr., counsel for Petitioners, for the extension, and Petitioners advised they had no objection to this request. Respondents are requesting this extension due to counsel’s current workload and professional commitments.

Accordingly, Respondents respectfully assert that good cause exists for this Court to grant the extension. Respondents' current deadline to file their return is March 28, 2025, and a ten-day extension would result in a new deadline of Monday, April 7, 2025.

WHEREFORE, Respondents respectfully request that this Court enter an order granting an extension of ten days to file their return to Petitioners' Petition for a Writ of Certiorari.

Respectfully submitted,



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March 6, 2025
Columbia, South Carolina