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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

Case 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; Professional Account Services, Inc Petitioners.

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

Pursuant to 240(a), SCACR, Petitioners Mary Black Health System, LLC, d/b/a Mary Black Memorial Hospital; CHSPSC, LLC; and Professional Account Services, Inc. (collectively, “Petitioners”) respectfully request an extension of time of ten (10) days within which to file their Reply to Respondents Jo Ann Blackwell, Michelene Brooks, and Samuel H. Owens, Jr.’s Return to the Petition for a Writ of Certiorari. Petitioners’ current deadline for serving and filing their Reply to the Return to the Petition for a Writ of Certiorari is Thursday, April 17, 2025.

As a result of Petitioners’ counsels’ work schedule, Petitioners respectfully contend that good cause exists for an extension of time to file their Reply to the Return to the Petition for a Writ of Certiorari. This is Petitioner’s first motion requesting an extension of time to file their Reply to the Return to the Petition for a Writ of Certiorari.

For these reasons, Petitioners respectfully contend that good cause exists for an extension of time to file their Reply to the Return to the Petition for a Writ of Certiorari.

WHEREFORE, Petitioners respectfully request the Court issue an order granting an extension of ten (10) days to file their Reply to the Return to the Petition for a Writ of Certiorari up to and including Monday, April 28, 2025.

s/Katon E. Dawson Jr.

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

April 9, 2025
Columbia, South Carolina