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SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas
Grace Gilchrist Knie, Circuit Court Judge

Case No. 2024-001042

Rachel Sanders, Respondent,

v.

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, Defendants
Of which Modern Construction Services, LLC is the Appellant.

PROOF OF SERVICE

I certify that I have served a copy of Appellant Modern Construction Services, LLC's Notice of Non-Compliance and Motion to Compel, and Appellant's Motion to Hold the Deadline for Filing its Reply Brief in Abeyance, or in the alternative, Motion For Extension of Time upon Respondent's counsel primary email addresses listed in the Attorney Information System:

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April 21, 2025

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April 21, 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

RE: Racheal Sanders

v.

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 and Modern Construction Services, LLC v. Rachel Sanders.

Of which Modern Construction Services, LLC is the Appellant.

Appellate Case No.: 2024-001042

Dear Ms. Kitchings,

Attached for filing regarding Appellant Case No.: 2024-001042 are:

- **Appellant's Notice of Non-Compliance and Motion to Compel; and**
- **Appellant Modern Construction Services, LLC's Motion to Hold the Deadline for Filing its Reply Brief in Abeyance, or in the alternative, Motion For Extension of Time.**

A check for the Court's fees for these motions will be delivered to your office overnight by FedEx.

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.

WINDLE TERRY BIMBO

s/ Don R. Terry

Don R. Terry
Attorney for Appellant
Modern Construction Services LLC

Enclosures

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