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May 22 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Alex Kinlaw, Circuit Court Judge

Case No.: 2022-CP-23-01799

Appellate Case No: 2024-001914

J. Mereinda Fisher, Individually, and as Respondent, Member of Fisher and Reid, LLC,
Respondent.

v.

Cynthia J. Glenn, individually, and as Member of Fisher and Reid, LLC, and Carolina
Birth Center, LLC d/b/a Carolina Water Birth
Appellant.

**SECOND MOTION FOR EXTENSION OF TIME WITHIN WHICH
TO SERVE AND FILE THE INITIAL BRIEF OF RESPONDENT**

Respondent, J. Mereinda Fisher, Individually and Member of Fisher and Reid, LLC,
through her undersigned counsel, would respectfully show unto this Court as follows:

The Respondent's Brief is due to be served and filed no later than May 23, 2025.
However, due to counsel's workload, counsel requests an extension of time in which to
serve and file the Respondent's Brief for thirty (30) days.

Respondent's request for an extension is not intended for purposes of delay.

WHEREFORE, Respondent prays that this Court grant her Second Motion for Extension of Time within which to serve and file the Respondent's Brief in this case for an additional thirty (30) days from May 23, 2025 and for such other relief as this Court may deem just and proper.

Respectfully submitted,

DUGGAN & HUGHES, LLC

s/Daniel R. Hughes

DANIEL R. HUGHES (SC Bar #72547)

457-B Pennsylvania Avenue

P. O. Box 449

Greer, SC 29652-0449

Telephone: (864) 334-2500

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ATTORNEYS FOR RESPONDENT

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Respondent.

v.

Cynthia J. Glenn, individually, and as Member of Fisher and Reid, LLC, and Carolina
Birth Center, LLC d/b/a Carolina Water Birth
Appellant.

PROOF OF SERVICE

I certify that I have served Respondent's Second Motion for Extension of Time
on Appellant, Cynthia J. Glenn, individually, and as Member of Fisher and Reid, LLC, and
Carolina Birth Center, LLC d/b/a Carolina Water Birth, electronically and by depositing a
copy of it in the United States Mail, postage prepaid to the following:

sandy@carolinawaterbirth.com

Cynthia J. Glenn, individually and as Member of Fisher and Reid, LLC,
and Carolina Birth Center, LLC d/b/a Carolina Water Birth
411 West Main Street, ICO Unit 87
Gray Court, SC 29645.

Respectfully submitted,

DUGGAN & HUGHES, LLC

s/Daniel R. Hughes

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DUGGAN & HUGHES, LLC
ATTORNEYS AND COUNSELORS AT LAW

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May 22, 2025

Via Email to ctappfilings@sccourts.org

Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
P.O. Box 11629
Columbia, SC 29211

**Re: J. Mereinda Fisher, individually, and Member of Fisher and Reid, LLC. v.
Cynthia J. Glenn, et al.
C.A. No.: 2022-CP-23-01799
Appellate Case No.: 2024-001914
File No.: DH22.0053**

Dear Sir or Madam:

Enclosed herewith please find the Respondents' 2nd Motion for Extension and Proof of Service for the Respondent along with the filing fee of \$50.00.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

DUGGAN & HUGHES, LLC



Daniel R. Hughes

DRH/tab
Enclosure

cc: **Via E-mail to sandy@carolinawaterbirth.com and Regular Mail**
Cynthia J. Glenn, individually and as Member of Fisher and Reid, LLC,
and Carolina Birth Center, LLC d/b/a Carolina Water Birth
411 West Main Street, ICO Unit 87
Gray Court, SC 29645.