

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

The Honorable Alex Kinlaw, Circuit Court Judge

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Case No.: 2022-CP-23-01799

Appellate Case No: 2024-001914

104827  
**RECEIVED**

MAY 28 2025

SC Court of Appeals

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.

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

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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  
Facsimile: (864) 879-0149  
ATTORNEYS FOR RESPONDENT

May 22, 2025

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Respondent.

v.

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Birth Center, LLC d/b/a Carolina Water Birth  
Appellant.

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**PROOF OF SERVICE**

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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

DANIEL R. HUGHES (SC Bar #72547)

457-B Pennsylvania Avenue

P. O. Box 449

Greer, SC 29652-0449

Telephone: (864) 334-2500

Facsimile: (864) 879-0149

ATTORNEYS FOR RESPONDENT

May 22, 2025

**DUGGAN & HUGHES, LLC**  
ATTORNEYS AND COUNSELORS AT LAW

Daniel R. Hughes  
Evan C. Bramhall  
J. Alexander Zimmerman

457-B Pennsylvania Avenue  
Greer, South Carolina 29650  
Telephone: (864) 879-0144 or (864) 334-2500  
Facsimile: (864) 879-0149

Mailing Address  
Post Office Box 449  
Greer, S.C. 29652

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

**RECEIVED**

MAY 28 2025  
SC Court of Appeals

**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' 2<sup>nd</sup> 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.



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LAW OFFICES  
DUGGAN & HUGHES, LLC  
Post Office Box 449  
Greer, South Carolina 29652-0449

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TO:

MAY 28 2025

**SC Court of Appeals**

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

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