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SC Court of Appeals

**STATE OF SOUTH CAROLINA
In the Court of Appeals**

**APPEAL FROM LANCASTER COUNTY
Court of Common Pleas**

Deandrea G. Benjamin, Circuit Court Judge

**Case. No. 2018-CP-001127
Appeal No. 2022-001589**

**Morphis Pediatric Group of Lancaster, PA and
Elizabeth J. Morphis M.D, Appellants-Respondents**

v.

Paul David HessRespondent-Appellant

MOTION TO EXCEED PAGE LIMITS

Charles F. Thompson, Jr.
Malone, Thompson, Summers & Ott
339 Heyward Street
Columbia, S.C. 29201

Ryan Beasley, Esq.
Ryan Beasley Law
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Greenville, SC 29601

Attorneys for the Appellants

Other counsel of record:

David E. Rothstein, Esq.
Rothstein Law Firm, PA
1312 Augusta Street
Greenville, SC 29605

Attorney for the Respondent

On July 23, 2025, Appellant Morphis filed its petition for rehearing and suggestion for rehearing en banc. Appellant's counsel inadvertently exceeded the page limit of S.C. Rule App. P. 221(a). Morphis respectfully suggests that the petition reflects that a large number of issues needed to be addressed and the twenty-five (full) pages was necessary to appropriately analyze those issues. Morphis therefore requests that it be allowed to exceed the page limit. In the alternative, Morphis requests it be allowed to submit an amended petition that is within the limits of Rule 221(a).

MALONE, THOMPSON, SUMMERS & OTT LLC

/s/Charles F. Thompson Jr. _____
Charles F. Thompson, Jr. (64219)
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Dated this 7th day of August 2025

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SC Court of Appeals

**STATE OF SOUTH CAROLINA
In the Court of Appeals**

**APPEAL FROM KERSHAW COUNTY
Court of Common Pleas**

Deadra Jefferson, Circuit Court Judge

C. A. NO. 12-CP-26-4852

Town of Surfside Beach. Appellant

v.

Jacklyn J. DonevantRespondent

CERTIFICATION

I hereby certify that the accompanying motion to exceed page limits was served on Respondent by email and United States mail addressed to:

David E. Rothstein
BURNETTE SHUTT McDANIEL, P.A.
415 W. Washington Street
Greenville, SC 29601

August 7, 2025

s/ Charles F. Thompson, Jr.
Charles F. Thompson, Jr.