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Aug 26 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable Jocelyn Newman
Circuit Court Judge

Civil Action Case No. 2019-CP-40-04185
Appellate Case No. 2024-000548

Crystal Goodwin and James Goodwin Respondents,

v.

Midland Orthopaedics and Neurosurgery and Thomas J. Holbrook, M.D.Appellants.

**MOTION FOR EXTENSION OF TIME TO SERVE AND FILE INITIAL BRIEF AND
DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL**

Respondents Crystal Goodwin and James Goodwin hereby move, pursuant to Rule 263(b), SCACR, for a thirty-day extension (from August 27, 2025, to September 26, 2025) of the time in which to serve and file Respondents’ initial brief and designation of matter to be included in the record on appeal. The grounds for this motion are that there is good cause to grant the requested extension as Counsel has had numerous personal and professional obligations in the last several weeks and needs additional time to fully prepare the initial brief and designation of matter.

WHEREFORE, Respondents prays for an order extending the time in which to serve and file the Respondents’ initial brief and designation of matter to be included in the record on appeal by thirty (30) days, to September 26, 2025.

<<signature page to follow>>

August 26, 2025
Columbia, South Carolina

s/ Francis M. "Brink" Hinson, IV
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~and~

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v.

Midlands Orthopedics and Neurosurgery and Dr. Thomas J. Holbrook, M.D.Appellants,

CERTIFICATE OF SERVICE

Pursuant to Section (d)(1) of the Supreme Court’s Order Re: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended April 24, 2024), the undersigned employee of the HHP Law Group, LLC, counsel for the Respondent-Appellant, does hereby certify that service of the *Motion for Extension of Time to Serve and File Initial Brief and Designation of Matter to be Included in Record on Appeal* in the above-captioned matter was made upon all counsel of record by email on this 26th day of August, 2025 as follows:

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s/Christina Brown
Christina Brown, Esquire



HHP LAW GROUP

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August 26, 2025

Via Email Only

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Email: ctappfilings@sccourts.org

Re: Crystal Goodwin and James Goodwin v. Midlands Orthopedics and
Neurosurgery and Dr. Thomas J. Holbrook, M.D.
Civil Action No.: 2019-CP-40-04185
Appellate Case No.: 2024-000548
Extension to File Respondents' Initial Briefing

Dear Ms. Kitchings,

In connection with the above-referenced appeal, please allow this letter to request a thirty-day extension of time for Respondents Crystal Goodwin and James Goodwin to file their Initial Brief and Designation of Matter to be included in the Record on Appeal. Counsel has had numerous personal and professional obligations in the last several weeks and needs additional time to fully prepare the initial briefing. Pursuant to correspondence my office received and the previously granted extension from the Court of Appeal, the present deadline is August 27, 2025.

Thank you very much for your consideration of this request. My firm's \$50.00 check for the filing fee will be sent to the Court via Hand Delivery.

With kind regards, I remain,

Sincerely yours,

Francis M. "Brink" Hinson, IV

cc: Robert F. Goings, Sr., Esq. (via email at rgoings@goingslawfirm.com)
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