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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

J. Mark Hayes, II, Circuit Court Judge

Case No. 2017-CP-42-00219
Appellate Case No. 2025-000346

Jo Ann Blackwell, Michelene Brooks, and Samuel H. Owens, Jr., individually and on behalf of all others similarly situated,..... Respondents,

v.

Mary Black Health System, LLC, d/b/a Mary Black Memorial Hospital; CHSPSC, LLC; Professional Account Services, Inc ..... Petitioners.

PETITIONERS' FIRST MOTION FOR EXTENSION OF TIME TO FILE PETITIONERS' REPLY BRIEF

Pursuant to 240(a), SCACR, Petitioners Mary Black Health System, LLC, d/b/a Mary Black Memorial Hospital; CHSPSC, LLC; and Professional Account Services, Inc. (collectively, "Petitioners") respectfully request an extension of time of ten (10) days within which to file the Petitioners' Reply Brief.

In this appeal, the Court issued its order granting certiorari on June 25, 2025. The Petitioners' Brief was filed on July 25, 2025. After receiving a ten-day extension of time, Respondents' filed the Respondents' Brief on September 4, 2025. Therefore, the current deadline for serving and filing the Petitioners' Reply Brief is Monday, September 15, 2025.

As a result of Petitioners' counsels' work schedule, Petitioners respectfully contend that good cause exists for an extension of time to file the Petitioners' Reply Brief. Specifically,

Petitioners' counsels' work schedules include other ongoing appeals with briefing deadlines that overlap with the current briefing schedule in this appeal. This is Petitioner's first motion requesting an extension of time to file the Petitioners' Reply Brief.

For these reasons, Petitioners respectfully contend that good cause exists for an extension of time to file the Petitioners' Reply Brief.

WHEREFORE, Petitioners respectfully request the Court issue an order granting an extension of ten (10) days to file the Petitioners' Reply Brief up to and including Thursday, September 25, 2025.

s/Katon E. Dawson Jr.

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September 4, 2025
Columbia, South Carolina