

**RECEIVED**

**Nov 20 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

The Honorable William C. McMaster, III, Circuit Court Judge

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Appellate Case No. 2025-001598  
Lower Court Case No. 2024-CP-23-0246

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Charlotte Beverly Derrick,.....Appellant,

v.

Bon Secours St. Francis Health System, Inc. d/b/a St. Francis Downtown, and St. Francis Hospital,  
Inc. d/b/a St. Francis Downtown,.....Respondents.

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**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENTS' BRIEF**

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Pursuant to Rules 263(b) and 240, SCACR, the undersigned counsel for the Respondents respectfully requests an extension of the deadline to file the Respondents' brief from November 26, 2025 until January 26, 2026. This is the first such request and is made in good faith and not for the purpose of delay. The grounds for this request are that, in light of their winter schedules and the other demands of their practices, counsel for the Respondents need additional time to prepare its brief. Counsel for Respondents do not intend to request any further extensions absent extraordinary circumstances. The undersigned consulted with counsel for Appellant, who has no objection to this Motion.

*[Signature on following page]*

s/ Lillian Keeling

Fred W. "Trey" Suggs III, SC Bar No. 70222

Lillian K.H. Keeling, SC Bar No. 106490

Cassidy Coates Price, P.A.

1052 N. Church Street (29601)

Post Office Box 10529

Greenville, SC 29603

(864) 349-2616

*Attorneys for Respondents*

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**PROOF OF SERVICE**

I, the undersigned, do hereby state that I have on November 20, 2025 served copies of the **MOTION FOR EXTENSION OF TIME TO FILE RESPONDENTS' BRIEF** upon all other parties, through their attorney(s) of record, via electronic mail using the e-mail addresses listed in the Attorney Information System (AIS). A copy of the sent e-mail is enclosed with this Proof of Service.

s/ Lillian Keeling

Fred W. "Trey" Suggs III, SC Bar No. 70222

Lillian K.H. Keeling, SC Bar No. 106490

Cassidy Coates Price, P.A.

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Greenville, SC 29603

(864) 349-2616

*Attorneys for Respondents*

**From:** [Nicholas Uricchio](#)  
**To:** [Lillian Keeling](#); [Grady Query](#); [mikewsautter147@aol.com](mailto:mikewsautter147@aol.com)  
**Cc:** [Rebecca Pharr](#)  
**Subject:** Re: Derrick v. SF - respondent's request for extension  
**Date:** Tuesday, November 18, 2025 1:06:27 PM  
**Attachments:** [image001.png](#)

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Lillian,

We consent to the 60 days. You owe us one. Have a happy holiday season.

With kind regards,

Nick Uricchio

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**From:** Lillian Keeling <lkeeling@cassidycoates.com>  
**Sent:** Tuesday, November 18, 2025 12:49:31 PM  
**To:** Nicholas Uricchio <nuricchio@qlawsc.com>; Grady Query <gquery@qlawsc.com>;  
mikewsautter147@aol.com <mikewsautter147@aol.com>  
**Cc:** Rebecca Pharr <rpharr@cassidycoates.com>  
**Subject:** Derrick v. SF - respondent's request for extension

Hi Grady, Nick, and Mike,

We are requesting a 60 day extension to file our initial brief. I'm attaching the draft motion. I would like to include that appellant's counsel has no objection to our request if you consent?

I'm going ahead and asking for 60 days instead of 30 days given the upcoming holidays. I don't intend to need the entire time, but a typical 30 days puts me at a 12/26 deadline, which obviously isn't ideal. I figured it's better to be safe than sorry.

Please let me know if you object to our request.

Thanks!  
Lillian

**Lillian K. H. Keeling**

Attorney

e [lkeeling@cassidycoates.com](mailto:lkeeling@cassidycoates.com)

d 864.349.2605



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Rebecca E. Pharr  
Rpharr@cassidycoates.com  
864-349-2618

November 20, 2025

**RECEIVED**  
**Nov 20 2025**  
**SC Court of Appeals**

Jenny Abbott Kitchings  
Clerk, The Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RE: Charlotte Beverly Derrick v. St. Francis**  
**Appellate Case No. 2025-001598; Lower Case No. 2024-CP-23-0246**  
**CCP No.: 1171.0252**

Dear Madam Clerk:

Enclosed please find the Respondents' Motion for Extension of Time to File the Respondents' Initial Brief and Designation of Matter for the Record on Appeal. Additionally, I have included a Certificate of Service, and a check for the filing cost associated with this Motion.

Please let me know if you have any questions regarding the enclosed.

Sincerely,

**CASSIDY COATES PRICE, P.A.**

A handwritten signature in black ink that reads 'Rebecca Pharr'.

Rebecca Pharr, Paralegal to  
Fred W. "Trey" Suggs III and Lillian K. H. Keeling,  
Counsel for the Respondent

Enclosures

CC:

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