

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM YORK COUNTY
Court of Common Pleas

Steven H. John, Circuit Court Judge

Case No.: 2011-CP-46-00683

Samantha Jamison, as Personal Representative of the
Estate of Jayden Joenelle Jamison-Barber, deceased.....Respondent,

v.

Ansley L. Hilton, MD, individually and as agent,
servant or employee of Rock Hill Gynecological
and Obstetrical Associates, PA; Christopher B.
Benson, MD, as agent, servant or employee of Rock
Hill Gynecological and Obstetrical Associates, PA;
and Rock Hill Gynecological and Obstetrical Associates,
PA, Defendants,

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Of whom,

Rock Hill Gynecological and Obstetrical Associates, PA, is the.....Appellant.

MOTION FOR EXTENSION

The Appellant Rock Hill Gynecological and Obstetrical Associates, P.A., hereby requests
an extension of the deadline for serving and filing its Initial Appellant's Brief and Designation of
Matter for the Record on Appeal. The current deadline is December 2, 2013, and the Appellant

12-2-13
1-2-14

is requesting an extension until December 13, 2013. The grounds for this request are the following:

1. This appeal arises from a week-long trial, which produced a transcript of nearly 1,000 pages.
2. The attorneys for the Appellant are currently in the process of drafting an Appellee's Brief in a Fourth Circuit case (*First Professionals Ins. Co. v. Sutton*, Case No. 13-721) which is due shortly before the current deadline in this appeal.
3. The attorneys for the Appellant will need additional time to complete the Initial Appellant's Brief in this case after completing the brief mentioned above in item #2, especially in light of the shortened holiday week of November 25-29.
4. The Respondent will not be prejudiced by the granting of an additional 11 days for the Appellant to submit its Initial Appellant's Brief and Designation of Matter.
5. The undersigned have consulted with the attorneys for the Respondent, and they have consented to the request.

For these reasons, the Respondent respectfully requests that the Court extend the deadline for filing the Initial Appellant's Brief and Designation of Matter until December 13, 2013. The Respondent further requests that the current deadline be held in abeyance while this motion is pending.

Respectfully submitted,



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Attorneys for the Appellant

November 19, 2013

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Hill Gynecological and Obstetrical Associates, PA;
and Rock Hill Gynecological and Obstetrical Associates,
PA, Defendants,

Of whom,

Rock Hill Gynecological and Obstetrical Associates, PA, is the.....Appellant.

PROOF OF SERVICE

The undersigned, an attorney in this matter for the Appellant, certifies that I have this 19th
day of November, 2013, served copies of the **Motion for Extension** upon counsel of record for
the Respondent by causing them to be deposited in the United States mail with sufficient postage

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SC Court of Appeals

affixed, addressed to: D. Bradley Jordan, Esq.; Jordan Law Firm; P.O. Box 11785; Rock Hill, SC 29731; and James W. Boyd, Esq.; P.O. Box 36425; Rock Hill, SC 29732.

R. Hawthorne Barrett

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Attorneys for the Appellant

November 19, 2013

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REPLY TO:

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November 19, 2013

VIA HAND DELIVERY

Hon. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

Re: Samantha Jamison, et al. v. Ansley L. Hilton, MD, et al.
Case No.: 2011-CP-46-00683
Our File No.: 10350.105

Dear Ms. Kitchings:

Enclosed are the following materials: (1) the original and seven copies of a Motion for Extension, and (2) the original and one copy of the Proof of Service. Also enclosed is a check for the filing fee. Please file the originals and return the extra stamped copies to our courier. Thank you for your kind assistance.

Sincerely,

TURNER, PADGET, GRAHAM & LANEY, P.A.

R. Hawthorne Barrett

R. Hawthorne Barrett

RHB:
Enclosures

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SC Court of Appeals

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Hon. Jenny Abbott Kitchings

November 19, 2013

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cc: D. Bradley Jordan, Esq.
James W. Boyd, Esq.