

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM LEXINGTON COUNTY  
COURT OF COMMON PLEAS

Alison Renee Lee, Circuit Court Judge

CASE NO.: 2011-CP-32-02282

RECEIVED  
DEC 27 2013  
SC Court of Appeals

Tanya Bennett, as Next Friend of  
Mykelvion T., a minor.....Appellant,

v.

Lexington County Health Services District, Inc.  
d/b/a Lexington Medical Center.....Respondent.

MOTION FOR EXTENSION OF TIME  
TO FILE INITIAL BRIEF OF APPELLANT

COMES NOW, the Appellant, Tanya Bennett, as Next Friend of Mykelvion T., a minor, by and through their undersigned counsel hereby moves the Court, pursuant to Rule 224, SCACR, for an extension of time for 30 days to file its Appellant's Brief in this action, or until January 22, 2014, to file said Brief. In support hereof, the undersigned states the following:

1. The undersigned needs additional time to properly complete the Brief due to (a) the complexity of the issues involved in this case, involving a child with a permanent injury that was allegedly caused by medical negligence; and (b) numerous other professional responsibilities and commitments in other cases which have caused counsel to be out of the state or out of town.


2. The current deadline is December 23, 2013.
3. Appellant submits that an extension would not unduly delay these proceedings and would not cause prejudice.
4. Despite efforts to contact Respondent's counsel, Weldon Johnson, for his consent to this extension request, I have not heard from him as of the filing of this Motion.

WHEREFORE, Appellant respectfully requests until **January 22, 2014** in which to file the Initial Brief in this action.

Respectfully submitted,

GRAHAM LAW FIRM, P.A.

BY: \_\_\_\_\_

  
Edward L. Graham  
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**Attorney for Appellants**

December 23, 2013

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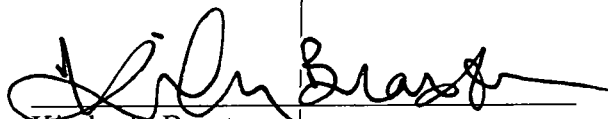
Lexington County Health Services District, Inc.  
d/b/a Lexington Medical Center.....

Respondent.

PROOF OF SERVICE

The undersigned, a Paralegal of the law offices of Graham Law Firm, PA., attorney for Appellants, do hereby certify that I have this **23rd day of December, 2103**, served a copy of the Appellant's **Motion for Extension of Time** upon counsel for the Respondent by depositing in the United States Mail, first-class postage prepaid, addressed to:

Weldon R. Johnson, Esq.  
Barnes, Alford, Stork & Johnson, LLP  
P.O. Box 8448  
Columbia, SC 29202

  
Kimberly Braxton  
Paralegal to Edward L. Graham