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FEB 03 2014

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

SC Court of Appeals

Marvin H. Dukes, III., Special Circuit Court Judge

Case No. 2012-CP-07-3595

Charles Gary,..... Respondent,

v.

Hattie M. Askew, Will Outlaw, and Deboria Outlaw,
individually and d/b/a Low Country Medical Transport,
Low Country Medical Transport, Inc., Eugene A.
Kirkland, and American Medical Response, Inc. (d/b/a
Access2Care), Defendants.

Of whom American Medical Response, Inc. (d/b/a
Access2Care) is Appellant.

Motion for an Extension of Time

Pursuant to Rules 208 and 240 of the South Carolina Appellate Court Rules, Appellant, American Medical Response, Inc. (d/b/a Access2Care) ("AMR"), moves this Court for an order granting a thirty (30) day extension of time to file its Initial Appellant's Brief and Designation of Matters in the above-captioned appeal. This is AMR's second extension request. No party will be prejudiced by this extension.

Per order of this Court dated January 31, 2014, AMR's Initial Appellant's Brief and Designation of Matters are due on February 12, 2014. The new deadline, after this 30 day extension, would be March 13, 2014.

and
3/13/14

The extension is necessitated due to other conflicting deadlines and work obligations. Such conflicts prevent undersigned counsel from completing AMR's Initial Appellant's Brief and Designation of Matters within the current deadline.

Therefore, AMR moves this Court to extend the deadline for its Initial Appellant's Brief and Designation of Matters until March 13, 2014. AMR asks that the current deadline be held in abeyance pending the Court's resolution of this motion.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 

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*Attorneys for American Medical Response, Inc. (d/b/a
Access2Care)*

February 3, 2014

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individually and d/b/a Low Country Medical Transport,
Low Country Medical Transport, Inc., Eugene A.
Kirkland, and American Medical Response, Inc. (d/b/a
Access2Care) Defendants

Of whom American Medical Response, Inc. (d/b/a
Access2Care) is, Appellant.

PROOF OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for American Medical Response, Inc. (d/b/a Access2Care), do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings:

MOTION FOR AN EXTENSION OF TIME

Counsel Served:

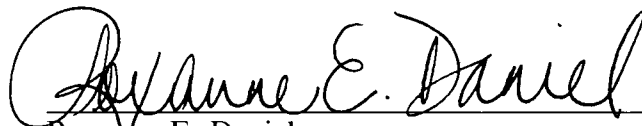
Attorney for Respondent Charles Gary

Joseph Dawson III, Esquire
Post Office Box 41367
North Charleston, SC 29423

*Attorneys for Hattie M. Askew, Eugene Kirkland, Deboria
Outlaw, Will Outlaw, and Low Country Medical
Transport, Inc.*

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Erin DuBose Dean, Esquire
Tupper Grimsley & Dean, PA
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A handwritten signature in cursive script that reads "Roxanne E. Daniel". The signature is written in black ink and is positioned above a horizontal line.

Roxanne E. Daniel
Administrative Assistant

Feb. 3, 2014

Nelson Mullins

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SC Court of Appeals

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February 3, 2014

The Honorable Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
1015 Sumter Street - 5th Floor
Columbia, SC 29201

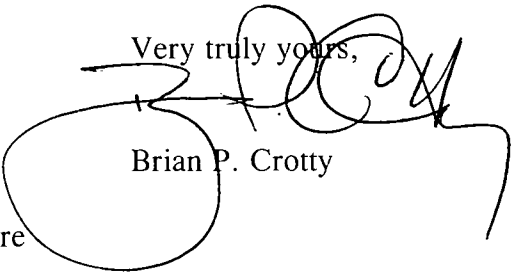
RE: Charles Gary v. Hattie M. Askew, Will Outlaw, and Deboria Outlaw,
individually and d/b/a Lowcounty Medical Transport, Low County Medical
Transport, Inc., Eugene A. Kirkland, and American Medical Response, Inc.,
d/b/a Access2Care
C/A No. 2012-CP-07-43595
Our File No. 27717/01501

Dear Ms. Kitchings:

Attached please find a Motion for an Extension of Time, which was inadvertently excluded from the letter we sent you earlier today.

As explained in our prior letter, due to other deadlines and work obligations, the Appellant respectfully requests a thirty (30) day extension of time to file its Initial Brief and Designation of Matter to be Included in the Record on Appeal. This is the second request for an extension of time for this brief by the Appellant, and based on our calculations, the new deadline would be March 13, 2014. We would also ask that the Court hold the current deadline in abeyance until an Order is issued on this request. Our check for \$25.00 representing the required motion fee was enclosed with our prior letter regarding this extension.

Very truly yours,


Brian P. Crotty

Enclosure

cc: Joseph Dawson, III, Esquire
Cory Fleming, Esquire
Erin DuBose Dean, Esquire
Robert H. Hood, Esquire
Robert H. Hood, Jr., Esquire

The Honorable Jenny Abbott Kitchings
February 3, 2014
Page 2

H. Cooper Wilson, Jr., Esquire

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C/A No. 2012-CP-07-43595
Our File No. 27717/01501

Dear Ms. Kitchings:

Due to other deadlines and work obligations, the Appellant respectfully requests a thirty (30) day extension of time to file its Initial Brief and Designation of Matter to be Included in the Record on Appeal. This is the second request for an extension of time for this brief by the Appellant, and based on our calculations, the new deadline would be March 13, 2014. We would also ask that the Court hold the current deadline in abeyance until an Order is issued on this request. Our check for \$25.00 is enclosed as the required motion fee.

Very truly yours,


Brian P. Crotty

BPC:lpw
Enclosure

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Cory Fleming, Esquire
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Robert H. Hood, Esquire
Robert H. Hood, Jr., Esquire
H. Cooper Wilson, Jr., Esquire

2013-002674
E.C.