

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

71481

APPEAL FROM LEXINGTON COUNTY
COURT OF COMMON PLEAS

Alison Renee Lee, Circuit Court Judge

CASE NO.: 2011-CP-32-02282

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.

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MAR 06 2014

SC Court of Appeals

MOTION FOR EXTENSION OF TIME
TO FILE REPLY 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 14 days to file her Reply Brief in this action, or until **March 17, 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 numerous other professional responsibilities and commitments in other cases. Due to extraordinary circumstances, Appellant's counsel has been out of state for seven out of ten days following the filing of Respondent's Initial Brief, and was in

Conway for an additional day in that period, such trips being for multiple depositions of physicians in upcoming medical negligence cases.

2. The current deadline is March 3, 2014.
3. Appellant submits that an extension would not unduly delay these proceedings and would not cause prejudice.
4. Appellant has communicated with Weldon R. Johnson, counsel for Respondent, and he has consented to the extension.

WHEREFORE, Appellant respectfully requests until **March 17, 2014** in which to file the Reply Brief and Response to Respondent's Motion to Strike in this action.

Respectfully submitted,

GRAHAM LAW FIRM, P.A.

BY: 

Edward L. Graham, SC Bar No.: 2483
J. Layton Ruffin, SC Bar No.: 78267
P.O. Box 550
Florence, SC 29503
843-662-3281-T
843-665-0254-F

Attorney for Appellants

March 3, 2014

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

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

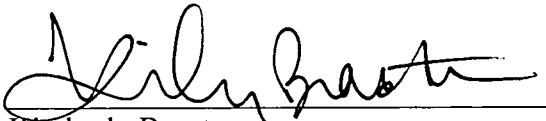
v.

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

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 **3rd day of March, 2014**, 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

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GRAHAM LAW

Shining a Light on Safety, Guiding the Way to Justice.

Edward L. Graham
Diane M. Rodriguez, RN-JD
Mary H. Watters
J. Layton Ruffin

March 3, 2014

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

**RE: 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
2013-001410**

Dear Ms. Kitchings:

Enclosed please find my firm's check in the amount of \$25.00 along with an original and 6 copies of a Motion for Extension of Time to File Appellant's Reply Brief in the above-referenced action until March 17, 2014.

As per the attached Proof of Service, we are serving all counsel of record with a copy of this request.

With kindest personal regards, I am

Yours very truly,

EDWARD L. GRAHAM

ELG/kb
Encl.
cc: Weldon R. Johnson, Esq.

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SC Court of Appeals

GRAHAM LAW FIRM, P.A.
383 West Cheves Street, Florence, SC 29501
P.O. Box 550, Florence, SC 29503
Phone 843.662.3281 or 1.877.475.8877 • Fax 843.665.0254

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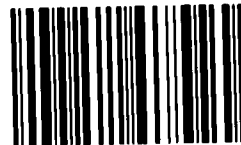
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S.C. Court of Appeals
P.O. Box 11629
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