

STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM YORK COUNTY  
Court of Common Pleas

The Honorable S. Jackson Kimball, Circuit Court Judge

Case No.: 2009-CP-46-5195

RECEIVED

APR 24 2014

SC Court of Appeals

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Angela Patton, as Next Friend of  
Alexia L., a minor, .....Appellants,

v.

Dr. Gregory A. Miller, Rock Hill Gynecological & Obstetrical Associates, P.A.  
And Amisub of South Carolina, d/b/a Piedmont Medical Center, .....Respondents.

**MOTION FOR EXTENSION OF TIME TO  
FILE THE INITIAL BRIEF**

COMES NOW, the Appellant, Angela Patton, as Next Friend for Alexia L., a minor, by and through her undersigned counsel, and hereby moves the Court, pursuant to Rule 224, SCACR, for an extension of time for 30 days to file the Initial Brief in this action, or until **May 23, 2014** to file said Initial Brief. In support hereof, the undersigned states the following:

1. The paralegal on this case recently resigned; and until Appellant's counsel can replace her, Counsel will need to reassign this project to another paralegal who is now facing her own deadlines and cannot finish the work on this brief in time for the April 23, 2014 deadline.
2. The attorney assigned to this case has recently been out of state/town for numerous depositions, mediations and court appearances.


3. The current deadline is April 23, 2014.
4. Appellant submits that an extension would not unduly delay these proceedings and would not cause prejudice.
5. Respondent's counsel, William U. Gunn, R. Hawthorne Bennett and Ashby W. Davis, have given their consent for this extension.

WHEREFORE, Appellant respectfully requests until May 23, 2014 in which to file the Record on Appeal in this action.

Respectfully submitted,

GRAHAM LAW FIRM, P.A.

By: \_\_\_\_\_



Edward L. Graham  
383 W. Cheves St.  
Florence, SC 29501  
843-662-3281-T  
843-665-0254-F

**ATTORNEY FOR APPELLANTS**

**April 22, 2014**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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And Amisub of South Carolina, d/b/a Piedmont Medical Center, .....Respondents.

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**PROOF OF SERVICE**

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The undersigned, an attorney in this matter certifies that I have this **22nd day of April, 2014** served a copy of the Appellant's **Motion for Extension of Time to File the Record on Appeal** upon counsel for the Respondent by depositing in the United States mail, first-class postage prepaid, addressed to:

Ashby W. Davis, Esq.  
Davis & Snyder, P.A.  
5 Hawthorne Park Ct.  
Greenville, SC 29615

R. Hawthorne Barrett, Esq.  
Turner, Padgett, Graham & Laney, P.A.  
Post Office Box 1473  
Columbia, SC 29202

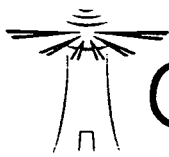
William U. Gunn, Esq.  
Holcombe Bomar, P.A.  
Post Office Drawer 1897  
Spartanburg, SC 29304



By: \_\_\_\_\_

Edward L. Graham  
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(843) 662-3281

Attorney for the Appellant



# GRAHAM LAW

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

April 22, 2014

The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina Court of Appeals  
1015 Sumter St.  
Columbia, SC 29201

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

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**RE: *Angela Patton, as Next Friend of Alexia L., a minor v. Dr. Gregory A. Miller, Rock Hill Gynecological & Obstetrical Associates, P.A. and Amisub of South Carolina, d/b/a Piedmont Medical Center***

***C/A No.: 2009-CP-46-5195***

Dear Ms. Kitchings:

Enclosed please find my firm's check in the amount of \$25.00 along with the original and 6 copies of a Motion for Extension of Time to File the Record on Appeal in the above referenced matter or until **May 23, 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*  
Edward L. Graham

ELG/cah

Enclosures

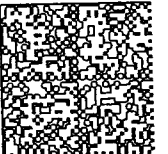
cc: R. Hawthorne Barrett, Esq.  
William U. Gunn, Esq.  
Ashby W. Davis, Esq.



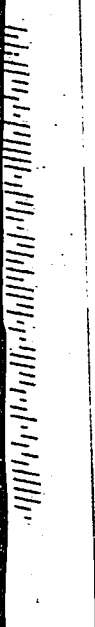
# GRAHAM LAW

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The Honorable Jenny Abbott Kitchings  
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