

THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

Appeal from Union County  
Court of Common Pleas

John C. Hayes, III, Circuit Court Judge

Case No. 2011-CP-44-00074

**RECEIVED**

MAY 02 2014

S.C. SUPREME COURT

Sarah Dawkins,

Appellant,

v.

Union Hospital District (aka) Wallace Thomson Hospital,

Respondent.

CONSENT MOTION FOR SECOND EXTENSION OF TIME  
TO PETITION FOR REHEARING

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (Bar No. 66468)  
William L. Howard, Sr. (Bar No. 2681)  
Russell G. Hines (Bar No. 72100)  
25 Calhoun Street, Suite 400 (29401)  
P.O. Box 993  
Charleston, South Carolina 29402  
(843) 720-5488  
*Attorneys for the Respondent,  
Union Hospital District  
(aka) Wallace Thomson Hospital*

COMES NOW the Respondent, Union Hospital District (aka) Wallace Thomson Hospital, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and, upon the grounds set forth below, respectfully requests that this Honorable Court grant it a second 15-day extension of time to petition for rehearing in this matter.

1. The opinion of the Court was filed on April 9, 2014; therefore, pursuant to Rule 221(a), SCACR, the original deadline for petitioning for rehearing was April 24, 2014.

2. The Court has granted one 15-day extension of this deadline, which runs through May 9, 2014.

3. The Respondent has now retained Young Clement Rivers, LLP, as counsel (in addition to Holcombe Bomar, P.A.) to pursue a petition for rehearing in this Court, and Stephen L. Brown; William L. Howard, Sr.; and Russell G. Hines, of Young Clement Rivers, LLP, are noticing their appearance contemporaneously with this motion.

4. The Respondent respectfully submits that the Court's allowance of an additional 15-day extension of time for its new counsel to analyze this matter and prepare a petition for rehearing is in the interests of justice, and also in the interests of the bench and bar, and of the public, in light of the importance of the issue before the Court herein.

5. The Respondent also respectfully submits that allowance of the requested extension will not work any prejudice upon the Appellant.

6. Prior to making this motion, the Respondent's counsel communicated with John S. Nichols, Esquire, counsel for the Appellant, and Mr. Nichols has kindly authorized the Respondent to represent to the Court that the Appellant consents to the requested extension.

WHEREFORE, the Respondent moves for a 15-day extension from May 9, 2014, to petition for rehearing. By the Respondent's calculations, if this extension is granted, the new deadline for petitioning for rehearing will be Monday, May 26, 2014, because the 15<sup>th</sup> day after May 9, 2014 is a Saturday.

**In light of the jurisdictional importance of timely petitioning for rehearing, the Respondent most respectfully asks that the Court hold this matter in abeyance until it acts upon the instant motion, or, if possible, that the Court rule upon the instant motion at its earliest convenience so that the Respondent may still have time to submit a petition for rehearing by the present May 9, 2014 deadline if the Court is not inclined to grant the extension requested herein.**

**<SIGNED ON THE FOLLOWING PAGE>**

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: 

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*-and-*

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*Attorneys for the Respondent,  
Union Hospital District  
(aka) Wallace Thomson Hospital*

Charleston, South Carolina

Dated:   
\_\_\_\_\_

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for the Respondent Union Hospital District (aka) Wallace Thomson Hospital, do hereby certify that I have served the **Notice of Appearance on Behalf of Respondent** and the Respondent's **Consent Motion for Second Extension of Deadline to Petition for Rehearing** on all other parties or counsel of record in this matter by depositing copies of the same in the United States Mail, postage prepaid, on May 2, 2014, addressed as follows:

John S. Nichols, Esquire  
Bluestein, Nichols, Thompson & Delgado, LLC  
P.O. Box 7965  
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*(Counsel for the Appellant)*

Donald Gist, Esquire  
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YOUNG CLEMENT RIVERS, LLP

By:   
\_\_\_\_\_  
Russell G. Hines

Charleston, South Carolina

Dated:   
\_\_\_\_\_