

THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY
COURT OF COMMON PLEAS

HONORABLE R. MARKLEY DENNIS
CIRCUIT COURT JUDGE

C.A. NO. 2013-CP-10-00088
CT. APP. NO.: 2013-001673

RECEIVED

APR 29 2014

SC Court of Appeals

BEVERLY C. MOORE-ROWE Appellant,

vs.

BON SECOURS-ST. FRANCIS XAVIER HOSPITAL, INC., D/B/A BON SECOURS ST. FRANCIS XAVIER HOSPITAL, BON SECOURS ST. FRANCIS HOSPITAL AND ROPER ST. FRANCIS HEALTHCARE; BON SECOURS ST. FRANCIS HEALTH SYSTEM, INC., D/B/A BON SECOURS ST. FRANCIS XAVIER HOSPITAL, BON SECOURS ST. FRANCIS HOSPITAL AND ROPER ST. FRANCIS HEALTHCARE; BON SECOURS HEALTH SYSTEM, INC., D/B/A BON SECOURS ST. FRANCIS HOSPITAL AND ROPER ST. FRANCIS HEALTHCARE; ROPER ST. FRANCIS FOUNDATION, D/B/A ROPER ST. FRANCIS HEALTHCARE; BON SECOURS-ST. FRANCIS HEALTH SYSTEM FOUNDATION, INC., D/B/A ROPER ST. FRANCIS HEALTHCARE; ROPER HOSPITAL, INC., D/B/A ROPER ST. FRANCIS HEALTHCARE; BYRON N. BAILEY, M.D.; CHRISTINE C. THOMPSON, M.D., A/K/A CHRISTINE THOMPSON, M.D.; CHARLESTON NEUROSURGICAL ASSOCIATES, LLC; MT. PLEASANT ANESTHESIA ASSOCIATES, PA; CHARLESTON SURGERY CENTER LIMITED PARTNERSHIP, D/B/A CHARLESTON SURGERY CENTER; TAMMY MCGRAW, CRNA, ALSO KNOWN AS TAMMY MCGRAW SPEICHER, CRNA; NURSE ANESTHESIA OF SOUTH CAROLINA, LLC; JEFFERY S. WAGER, CRNA; TRICOASTAL HEALTHCARE BILLING AND MANAGEMENT, INC.; AND STEVEN HEATH COBB

..... Respondents,

MOTION FOR EXTENSION TO FILE AND SERVE REPLY BRIEF

Beverly C. Moore-Rowe, the Appellant herein, does hereby respectfully request that this Honorable Court grant the Appellant an Extension to file and serve the Appellant's Reply Brief.

The Appellant acknowledges receipt of the Initial Respondent Brief and has become aware that a Reply Brief to the Respondent's Initial Brief may be filed and served and if filed, must be served within Ten (10) days after service upon me of the Respondent's Brief.

The Appellant and her husband, Arthur Peter Rowe, are representing themselves, Pro-Se. Unfortunately, both Appellant and her husband, Arthur Peter Rowe, had had serious health issues. The Appellant, Beverly C. Moore-Rowe, is presently recovering from pneumonia. A copy of a letter dated April 21, 2014 from the Appellant's family physician, Stephen Busby, MD, is enclosed.

The Appellant is respectfully requesting an extension of time until Monday, June 2, 2014, to timely file and serve the Reply Brief.

If this Honorable Court should determine not to grant the Appellant the extension of time until Monday, June 2, 2014 to timely file and serve the Reply Brief, then the Appellant respectfully requests that this Honorable Court please provide written notice of the same to Appellant and grant such additional time as this Honorable Court shall determine to be reasonable, necessary and appropriate for Appellant to timely file and serve the required document.

RESPECTFULLY SUBMITTED,



BEVERLY C. MOORE-ROWE, Pro Se
Plaintiff/Appellant
52 Chadwick Drive
Charleston, South Carolina 29407
Telephone: (843) 763-2599; (843) 737-0733

Charleston, South Carolina
Dated: April 25, 2014

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BEVERLY C. MOORE-ROWE

52 Chadwick Drive
Charleston, S.C. 29407
(843) 737-0733

April ²⁵~~24~~, 2014

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APR 29 2014

SC Court of Appeals

The Honorable Jenny Abbott Kitchings, Clerk Of Court
South Carolina Court of Appeals
1015 Sumter Street
P. O. Box 11629
Columbia, SC 29211

Re: Request for Extension
Appeal from Charleston County Court of Appeals
Case: Beverly C. Moore-Rowe vs. Bon Secours St. Francis Xavier Hospital, Inc. et al;
Circuit Court Case Number: **2013-CP-10-00088**
SC Court Appeals Case No.: **2013-001673**

Dear Ms. Kitchings:

I am proceeding pro-se in the appeal of the grant of Summary Judgment in the above-referenced Circuit Court matter. I have already filed the Transcript of Record, my Initial Appellant Brief pursuant to SC Appellate Court Rule 208, and my Designation Of Matter To Be Included In The Record On Appeal, pursuant to S.C. Appellate Rule 209. I have received the Initial Respondent Brief and understand that a Reply Brief to the Respondent's Initial Brief may be filed and served and if filed by me, must be served within Ten (10) days after service upon me of the Respondent's Brief.

I am informed that Rule 210 of the S.C. Appellate Court Rules requires that I serve a copy of the Record on Appeal on all parties having filed a brief, within thirty (30) days after service of the last brief.

My husband, Arthur Peter Rowe, and I have been sick and are respectfully requesting an extension until Monday, June 2, 2014, to timely file and serve the Reply Brief and the Record On Appeal. I am enclosing a copy of a letter from our family physician, Stephen Busby, MD, dated April 21, 2014, concerning my diagnosis with pneumonia.

If this Honorable Court should determine not to grant me the extension of time until Monday, June 2, 2014 to timely file both the Reply Brief and the Record on Appeal, then I am respectfully requesting that this Honorable Court please grant me the extension of time until Monday, June 2, 2014, to timely file and serve the Record On Appeal. If this Honorable Court should determine not to grant my extension request for the Record On Appeal, then I am respectfully

Letter to Ms. Kitchings
Thursday, April 24, 2014
Page 2 25

BEVERLY C. MOORE-ROWE

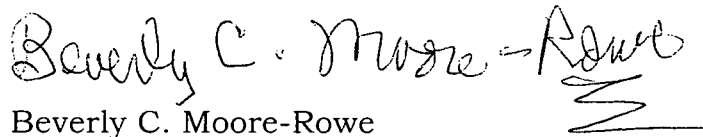
requesting written notice of the same with a grant of time from this Honorable Court for me to reasonably file and serve the required documents.

Please file the original enclosed Motion and return the copy stamped as filed in the enclosed self-addressed envelope.

By copy of this letter, I am providing a copy to all Attorneys of record.

Thank you for your consideration in this matter.

Sincerely yours,

A handwritten signature in cursive script that reads "Beverly C. Moore-Rowe". The signature is written in black ink and includes a stylized flourish at the end.

Beverly C. Moore-Rowe

Enclosure

cc:

Darren Kent Sanders, Esquire, w/encl.
Fred W. Suggs, III, Esquire, w/encl.
Jack Gordon Gresh, Esquire, w/encl.
Andrew Steven Halio, Esquire, w/encl.
Jonathan Hopkins Dunlap, Esquire, w/encl.
John Anthony Dunlap, Esquire, w/encl.
James Bernard Hood, Esquire, w/encl.
Christine K. Toporek, Esquire, w/encl.
Mt. Pleasant Anesthesia Associates, P.A., w/encl.



**WINDERMERE FAMILY
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Curtis D. Haskins, M.D. • Stephen C. Busby, M.D. • Annette Anderson, M.D.

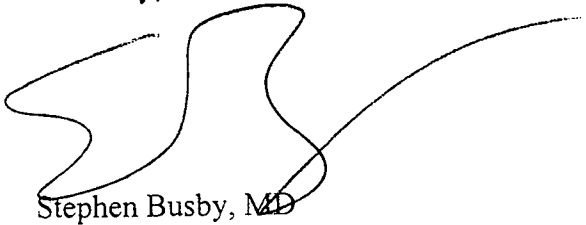
April 21, 2014

To Whom It May Concern:

I am writing this letter in regard to my patient Beverly Moore Rowe (DOB:12/29/1949). She was recently diagnosed with pneumonia and has suffered some additional medical issues since then. Mrs. Rowe has been too ill to get the information for her case together by the due date. I am asking that she be given an extension due to her current medical condition.

If you have any questions or concerns, feel free to contact myself or my staff at the numbers listed above.

Sincerely,



Stephen Busby, MD

THE STATE OF SOUTH CAROLINA

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..... Respondents,

PROOF OF SERVICE

I certify that I have served a copy of the Motion For Extension To File And Serve Reply Brief and the Motion For Extension To File And Serve Record On Appeal on the Respondents listed above, with all enclosures referenced therein, by depositing a copy of it in the United States Mail, postage prepaid, on April ~~24~~²⁵, 2014, addressed to the Respondents' Attorneys of record, as listed below:

Darren Kent Sanders, Esquire
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Mount Pleasant, S.C. 29465-2424

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Charleston, South Carolina
Dated: April 25 2014

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