

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

RECEIVED

APR 29 2014

APPEAL FROM CHARLESTON COUNTY SC Court of Appeals  
COURT OF COMMON PLEAS

HONORABLE R. MARKLEY DENNIS  
CIRCUIT COURT JUDGE

C.A. NO. 2013-CP-10-00090  
CT. APP. NO.: 2013-001682

ARTHUR PETER ROWE..... Arthur Peter 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

Arthur Peter 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 his wife, Beverly C. Moore-Rowe, are representing themselves, Pro-Se. Unfortunately, both Appellant and his wife, Beverly C. Moore-Rowe, had had serious health issues. The Appellant's wife, 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,



---

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

Charleston, South Carolina  
Dated: April 24, 2014

25

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

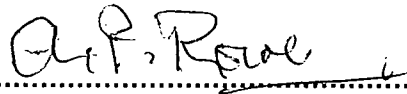
APPEAL FROM CHARLESTON COUNTY  
COURT OF COMMON PLEAS

HONORABLE R. MARKLEY DENNIS  
CIRCUIT COURT JUDGE

---

C.A. NO. 2013-CP-10-00090  
CT. APP. NO.: 2013-001682

---

ARTHUR PETER 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,

---

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 25, 2014, addressed to the Respondents' Attorneys of record, as listed below:

Darren Kent Sanders, Esquire  
Buyck & Sanders Law Firm, LLC  
P.O. Box 2424  
Mount Pleasant, S.C. 29465-2424

Fred W. Suggs, III, Esquire  
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.  
P.O. Box 10529  
Greenville, S.C. 29603

Jack Gordon Gresh, Esquire  
Hall, Booth, Smith & Slover, P.C.  
40 Calhoun Street, Suite 550  
Charleston, S.C. 29401

Andrew Steven Halio, Esquire  
Halio & Halio, PA  
PO Box 747  
Charleston S.C. 29402-0747

Jonathan Hopkins Dunlap, Esquire  
Batten Lee, PLLC  
8000 Weston Parkway, Suite 340  
Cary, N.C. 27513

John Anthony Dunlap, Esquires  
Carver, Darden, Koretzky, Tessier, Finn, Blossman & Areaux, L.L.C.  
1100 Poydras Street, Suite 3100  
New Orleans, LA 70163

James Bernard Hood, Esquire  
Hood Law Firm, LLC  
PO Box 1508  
Charleston S.C. 29402-1508

Christine Kent Toporek, Esquire  
PO Box 993  
Charleston, S.C. 29402



---

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

Charleston, South Carolina  
Dated: April 24, 2014

25

ARTHUR PETER ROWE

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

25  
April 24, 2014

RECEIVED

APR 29 2014

SC Court of Appeals

72050

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: Arthur Peter Rowe vs. Bon Secours St. Francis Xavier Hospital, Inc. et al;  
Circuit Court Case Number: **2013-CP-10-00090**  
SC Court Appeals Case No.: **2013-001682**

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 wife, Beverly C. Moore-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 wife's 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 <sup>25</sup>

ARTHUR PETER 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,



Arthur Peter 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  
MEDICINE & URGENT CARE**  
ROPER ST. FRANCIS PHYSICIANS

16 Windermere Boulevard, Charleston, SC 29407  
(843) 766-9053 P (843) 766-8853 F  
[www.windermerefamilymed.com](http://www.windermerefamilymed.com)

*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