

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

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 OF TIME TO FILE AND SERVE FINAL BRIEF

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SC Court of Appeals

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On Thursday, June 19, 2014, Beverly C. Moore-Rowe, the Appellant herein, received a copy of the letter from James B. Hood addressed to the Honorable Jenny Abbott Kitchings, Clerk, of the South Carolina Court of Appeals, with a copy of that certain, "Respondent's Motion to Compel the Appellant to Comply with the Appellate Rules In Regards To The Reply Brief And Record On Appeal", dated June 17, 2014. In that Motion, the Respondent alleges that the Record on Appeal that was filed with this Court was incomplete and that the service by copies on CD's was improper service. The Respondent further alleges that the section in the Appellant's Reply Brief concerning the abuse of discretion of the Trial Court in failing to extend the Forty-five (45) days grace period of S.C. Code Section 15-36-100, is a new issue and should be stricken.

All of these allegations must be reviewed thoroughly by Appellant and an adequate response must be made to this Court. In addition, the Appellant is not able to complete and file a Final Brief in this matter until this Honorable Court provides guidance to the Appellant as to whether the Record on Appeal filed and served by the Appellant is acceptable to the Court or whether a subsequent revised Record On Appeal must be completed by Appellant and filed with this Court and served on the Respondents.

The Appellant is respectfully requesting that this Honorable Court grant the Appellant an Extension of time to file and serve the Appellant's Final Brief as follows:

If this Honorable Court determines that the Record on Appeal filed with this Honorable Court by the Appellant is complete, then the Appellant would respectfully request an extension of time of Thirty (30) days after this Court issues that determination, to file and serve Appellant's Final Brief.

If this Honorable Court determines that the Record on Appeal filed with this Honorable Court by the Appellant is not correct and complete, then the Appellant would respectfully request an extension of time to revise and refile the Record on Appeal and serve the Respondents of Thirty (30) days after this Court issues that determination. The Appellant would then further respectfully request that this Honorable Court grant the Appellant the additional Twenty (20) days pursuant to Rule 211, to thereafter complete and file the Appellant's Final Brief.


The Appellant apologizes to this Honorable Court and to the Respondents for errors made in serving the Record on Appeal. The Appellant in the cover letter to Respondents offered to provide a hard copy if required but requested that Respondents accept the PDF copy on the CD in order to reduce costs and paper. Appellant also offered to accept service from Respondents of PDF copies on CD's. The Appellant is willing to provide hard copies to the Respondents if that is required.

If this Honorable Court should determine not to grant the Appellant the extension of time requested herein to timely file and serve the Final 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*

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: June 20, 2014

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

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,

PROOF OF SERVICE

I certify that I have served a copy of the Appellant's **Motion For Extension Of Time To File And Serve Final Brief** on the Respondents listed above, with all enclosures referenced therein, by depositing a copy of it in the United States Mail, postage prepaid, on Friday, June 20, 2014, addressed to the Respondents' Attorneys of record, as listed below:

Darren Kent Sanders, Esquire  
Buyck & Sanders Law Firm, LLC  
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*Beverly C. Moore-Rowe*

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Plaintiff/Appellant  
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Telephone: (843) 763-2599; (843) 737-0733

Charleston, South Carolina  
Dated: June 20, 2014

Beverly C. Moore-Rowe

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

June 20, 2014

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

RE: Beverly C. Moore-Rowe vs. Bon Secours-St Francis Xavier Hospital, Inc., et  
al  
Court Of Appeals Case Number: 2013-001673  
Charleston County Civil Action No.: 2013-CP10-00088

Dear Ms. Kitchings:

I am sending to you the original and a copy of my Motion for Extension  
To File Final Brief in the above-referenced matter. I am also enclosing the  
original and a copy of the Affidavit of Service.

By copy of this letter, I am simultaneously serving the Respondents with  
a copy of the Motion for Extension To File Final Brief and the Affidavit Of  
Service.

I am respectfully requesting that you please file the above-referenced  
original documents and return the enclosed copies, marked as filed, in the  
enclosed self-addressed stamped envelope provided. Thank you for your  
assistance in this matter.

Thank you for your consideration.

Sincerely yours,

*Beverly Moore-Rowe*

Beverly C. Moore-Rowe

**RECEIVED**

JUN 23 2014

**SC Court of Appeals**

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Enclosures