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THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**

JUL 16 2014

APPEAL FROM RICHLAND COUNTY  
In the Court of Common Pleas

**SC Court of Appeals**

G. Thomas Cooper, Jr., Presiding Judge

72886

Appellate Case No. 2014-001115

Kristin Joseph P.T., Thomas N. Joseph, M.D.,  
and William G. McCarthy, M.D.,.....Appellants,

v.

South Carolina Department of Labor, Licensing  
and Regulation, South Carolina Board of Physical  
Therapy,.....Respondents,

and

South Carolina Chapter, American Physical  
Therapy Association, Joseph M. McKowen, P.T.,  
Sabrina Queen Bridges, PTA, and Amalia W. Kirby, PTA,.....Respondents.

**MOTION FOR EXTENTION OF TIME TO FILE RESPONDENTS' INITIAL  
BRIEF AND DESIGNATION OF MATTER**

The undersigned, as counsel for Respondents South Carolina Chapter, American Physical Therapy Association, South Carolina Department of Labor, Licensing and Regulation, South Carolina Board of Physical Therapy, Joseph M. McKowen, P.T., Sabrina Queen Bridges, PTA, and Amalia W. Kirby, PTA, hereby move for a Thirty (30) day extension of time to file their Initial Brief(s) and Designation of Matter. This Motion is made on the grounds that additional time is needed to prepare and file the Initial

Brief(s) and Designation of Matter. This extension request is not intended for purposes of delay. Further, there would be no prejudice to the parties by an extension of time. By the undersigned's calculations the extension, if granted, would extend Respondents' deadline for filing the return/reply to Wednesday, September 10, 2014.

WHEREFORE, Respondents respectfully pray that this Court extend the deadline for the service and filing their Initial Brief(s) and Designation of Matter to September 10, 2014.

Respectfully submitted,

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

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West Columbia, SC  
July 16, 2014

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and

South Carolina Chapter, American Physical  
Therapy Association, Joseph M. McKowen, P.T.,  
Sabrina Queen Bridges, PTA, and Amalia W. Kirby, PTA.....Respondents.

**PROOF OF SERVICE**

I, Lynn G. Ivey, an employee of Moore Taylor Law Firm, P.A., certify that I have on this day effected service of the below-listed document(s) upon below-listed counsel, by placing a copy of same in the United States mail in an envelope with sufficient postage affixed thereto, and by electronic mail transmission, addressed as listed below.





July 16, 2014

The Honorable Jenny Abbott Kitchens  
The South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201  
VIA HAND DELIVERY

RE: Kristin Joseph, P.T., Thomas N. Joseph, M.D. and William G. McCarthy, M.D. vs. South Carolina Department of Labor, Licensing and Regulation, South Carolina Board of Physical Therapy, and South Carolina Chapter, American Physical Therapy Association, Joseph M. McKowen, P.T., Sabrina Queen Bridges, P.T.A., and Amalia W. Kirby, P.T.A.  
C/A 2012-CP-40-2632  
Appellate Case No. 2014-001115

Dear Ms. Kitchens:

Please find enclosed for filing, the original and nine copies of Respondents' Motion for Extension of Time to File Initial Brief and Designation of Matter in the above captioned matter. Please file the original and six copies and return the extra three clocked copies to us via our courier.

By copy of this letter to all counsel of record, we are hereby serving them with copies of the same.

Should you have any questions, please do not hesitate to contact our office.

Sincerely,

A handwritten signature in black ink that reads 'Lynn G. Ivey'.

Lynn G. Ivey  
Assistant to John C. Bradley, Jr.

Enclosures

cc: M. Elizabeth Crum, Esquire (via mail and email)  
Ariel Kirk, Esquire (via mail and email)  
Monteith P. Todd, Esquire (via email and mail)  
N. Thomas Connally, III, Esquire (via email)  
Marques Richeson, Esquire (via email)  
John Devlin, Esquire (via email)  
Sara McCartha, Esquire (via mail and email)  
Darra Coleman, Esquire (via mail and email)

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