

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

Appeal from Charleston County
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

Civil Case No. 2013-CP-10-03054
Appellate Case No. 2014-000252

Willie Preston, Individually and as the Personal Representative
of the Estate of Martha Preston, Deceased,

Appellant,

v.

Surgical Care Affiliates, LLC, Charleston Surgery Center, L.P.;
Laura Bilancione, R.N.; Coastal Anesthesia Associates; and
Christine Thompson, M.D.,

Defendants,

Of whom Coastal Anesthesia Associates is the

Respondent.

MOTION FOR EXTENSION

The Appellant's initial brief and designations were served on May 12, 2014, and thus, the Respondent's brief and additional designations were due Wednesday, June 11, 2014. By prior order of the Court, an extension was granted and the current due date is July 11, 2014. The Respondent seeks a further extension of 10 days, until July 21, 2014, for the reason that we been unable to finalize the brief due to the fact that counsel, James B. Hood, is on a trip out of the country this week. We have consulted with Counsel for the Appellant, Whitney Harrison, who has graciously consented to this extension, as evidenced by the attached email.

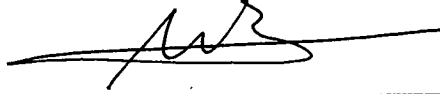
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SC Court of Appeals

Respectfully submitted,

Hood Law Firm, LLC



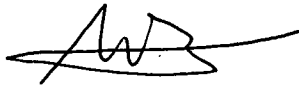
James B. Hood (SC #70212)
A. Walker Barnes (SC #78485)
Deborah H. Sheffield, *Of Counsel* (SC #2757)
172 Meeting Street ~ P.O. Box 1508
Charleston, South Carolina 29402
Phone: (843) 577-4435
Facsimile: (843) 722-1630
Attorneys for the Respondent
Coastal Anesthesia Associates

July 8, 2014

Certificate of Service

I certify that on this 8th day of July 2014, a copy of the foregoing Motion for Extension was served on the Appellant by depositing said copy in the U.S. Mail, with sufficient first class postage, addressed to their Counsel of Record of as listed below:

Whitney B. Harrison
McGowan, Hood & Felder, LLC
1517 Hampton Street
Columbia, SC 29201



A. Walker Barnes

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Walker Barnes

From: Whitney Harrison <wharrison@mcgowanhood.com>
Sent: Tuesday, July 08, 2014 8:54 AM
To: Walker Barnes; Ashley Creech
Cc: Jamie Hood; dhsheffieldatty@aol.com; Julie Dunn
Subject: FW: Preston - Appeal

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Walker,

We consent to a 10 day extension. Hope you're doing well.

Whitney

Whitney B. Harrison
McGowan, Hood & Felder, LLC
803.779.0100

From: Chad McGowan
Sent: Tuesday, July 08, 2014 7:47 AM
To: Ashley Creech; Whitney Harrison
Subject: Fwd: Preston - Appeal

Chad McGowan
McGowan, Hood, & Felder LLC
803-327-7800 (office)
803-984-8866 (cell)
Sent from my iPhone

Begin forwarded message:

From: Walker Barnes <walker.barnes@hoodlaw.com>
Date: July 8, 2014, 12:20:35 PM GMT+01:00
To: Chad McGowan <cmcgowan@mcgowanhood.com>
Cc: Deborah Sheffield <dhsheffieldatty@aol.com>, Julie Dunn <julie.dunn@hoodlaw.com>, Jamie Hood <james.hood@hoodlaw.com>
Subject: Preston - Appeal

Chad:

Our Respondent Brief is currently due this Friday, July 11. Jamie is out of the country this week, and we were wondering if you would be willing to grant a 10-day extension (to July 21) for us to file the Respondent Brief. I realize we already obtained a 30-day extension but was hoping one additional short extension would be acceptable so as to allow Jamie to return from his vacation and finalize the brief.

-Walker

July 8, 2014

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

Re: Willie Preston v. Surgical Care Affiliates, LLC, et al.
Appellate Case No. 2014-000252

Dear Clerk:

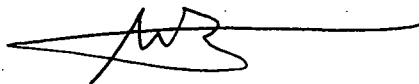
Enclosed please find the original and six (6) copies of the Respondent's Motion for Extension in reference to the brief and designations due on July 11, 2014. As evidenced by the email attached to the motion, we have consulted with Appellant's counsel who has graciously consented to the requested 10-day extension.

I am enclosing a check for the \$25.00 filing fee and I am serving Appellant's counsel with the motion by copy of this letter.

Thank you for your consideration of this request.

Kind regards,

Yours truly,



A. Walker Barnes

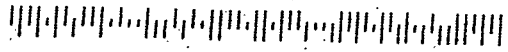
AWB/spc
Enclosure(s)
cc: Whitney B. Harrison, Esquire

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SC Court of Appeals

HOOD LAW FIRM
172 MEETING STREET
CHARLESTON, SC 29401



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The Honorable Jenny Abbott Kitchings
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Columbia, SC 29211

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