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AUG 22 2014

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

The Honorable S. Jackson Kimball, Circuit Court Judge

Case No.: 2013-00-2670

Angela Patton, as Next Friend of
Alexia L., a minor,Appellants,

v.

Dr. Gregory A. Miller, Rock Hill Gynecological & Obstetrical Associates, P.A.
And Amisub of South Carolina, d/b/a Piedmont Medical Center,Respondents.

**MOTION FOR EXTENSION OF TIME TO
FILE THE INITIAL BRIEF**

COMES NOW, the Appellant, Angela Patton, as Next Friend for Alexia L., a minor, by and through her undersigned counsel, and hereby moves the Court, pursuant to Rule 224, SCACR, for an extension of time for 30 days to file the Initial Brief in this action, or until May 23, 2014 to file said Initial Brief. In support hereof, the undersigned states the following:

1. The paralegal on this case recently resigned; and until Appellant's counsel can replace her, Counsel will need to reassign this project to another paralegal who is now facing her own deadlines and cannot finish the work on this brief in time for the April 23, 2014 deadline.
2. The attorney assigned to this case has recently been out of state/town for numerous depositions, mediations and court appearances.

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3. The current deadline is August 22, 2014.
4. Appellant submits that an extension would not unduly delay these proceedings and would not cause prejudice.
5. Respondent's counsel, William U. Gunn, R. Hawthorne Bennett and Ashby W. Davis, have given their consent for this extension.

WHEREFORE, Appellant respectfully requests until **October 6, 2014** in which to file the Record on Appeal in this action.

Respectfully submitted,

GRAHAM LAW FIRM, P.A.

By: 

Edward L. Graham
383 W. Cheves St.
Florence, SC 29501
843-662-3281-T
843-665-0254-F

ATTORNEY FOR APPELLANTS

August 21, 2014

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PROOF OF SERVICE

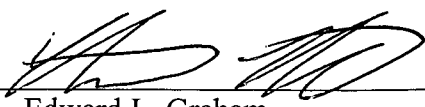
The undersigned, an attorney in this matter certifies that I have this 21st day of
August, 2014 served a copy of the Appellant's **Motion for Extension of Time to File the
Record on Appeal** upon counsel for the Respondent by depositing in the United States mail,
first-class postage prepaid, addressed to:

Ashby W. Davis, Esq.
Davis & Snyder, P.A.
5 Hawthorne Park Ct.
Greenville, SC 29615

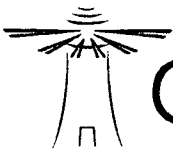
R. Hawthorne Barrett, Esq.
Turner, Padgett, Graham & Laney, P.A.
Post Office Box 1473
Columbia, SC 29202

William U. Gunn, Esq.
Holcombe Bomar, P.A.
Post Office Drawer 1897
Spartanburg, SC 29304

By: _____


Edward L. Graham
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Attorney for the Appellant



GRAHAM LAW

Shining a Light on Safety, Guiding the Way to Justice.

Edward L. Graham
Diane M. Rodriguez, RN-JD
J. Layton Ruffin

August 21, 2014

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
1015 Sumter St.
Columbia, SC 29201

RE: *Angela Patton, as Next Friend of Alexia L., a minor v. Dr. Gregory A. Miller, Rock Hill Gynecological & Obstetrical Associates, P.A. and Amisub of South Carolina, d/b/a Piedmont Medical Center*

C/A No.: 2013-00-2670

Dear Ms. Kitchings:

Enclosed please find my firm's check in the amount of \$25.00 along with the original and 6 copies of a Motion for Extension of Time to File the Record on Appeal in the above referenced matter or until **October 6, 2014.**

As per the attached Proof of Service, we are serving all counsel of record with a copy of this request.

With kindest personal regards, I am

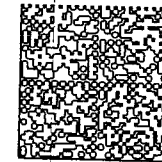
Yours very truly,

Edward L. Graham

ELG/jmr

Enclosures

cc: R. Hawthorne Barrett, Esq.
William U. Gunn, Esq.
Ashby W. Davis, Esq.



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