

IN THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS  
APPEAL FROM CHARLESTON COUNTY  
CIRCUIT COURT

73491

Honorable R. Markley Dennis, Jr., Circuit Court Judge  
(Circuit Court Case No.: 2009-CP-10-4943)

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Appellate Case No. 2013-001903

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Barbara Roehm.....Appellant,

vs.

Leigh M. McKenzie, MD, Ira Rosenshein, MD, Charla McEachin Napier, LMFT, Coastal Psychiatry, LLC,  
Defendants Of Whom Leigh McKenzie, MD, Coastal Psychiatry, LLC and Charla McEachin Napier, LMFT  
are.....Respondents.

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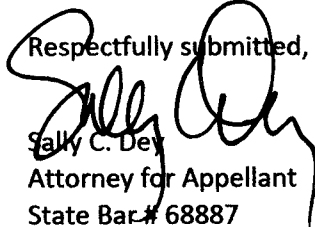
MOTION FOR EXTENSION TO FILE FINAL BRIEFS AND RECORD ON APPEAL

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Comes Now, the Appellant, Barbara Roehm ("Appellant") and moves the Court for an Order granting a sixty (60) day extension to her to file all Final Briefs and the Record on Appeal. Appellant bases her Motion on the following:

1. The remaining parties have reached a settlement which will resolve this appeal, but more time is needed to consummate the settlement;
2. Respondent Leigh McKenzie, by and through her counsel, D. Gary Lovell has consented to the extension and joins in the request for an extension;

Based upon the above, and upon the Affidavit of Sally C. Dey, filed concurrently herewith, Appellant respectfully requests that the Court grant all parties a sixty (60) day extension to file all Final Briefs and the Record on Appeal to allow the parties time to consummate a settlement of the case.

Respectfully submitted,  
  
Sally C. Dey  
Attorney for Appellant  
State Bar # 68887  
Law Office of Sally C. Dey  
3 Gamecock Ave., Ste. 306  
Charleston, SC 29407  
(843) 814-1695 – Work

**RECEIVED**

SEP 10 2014

**SC Court of Appeals**

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IN THE COURT OF APPEALS  
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AFFIDAVIT OF SALLY C. DEY IN SUPPORT OF  
MOTION FOR EXTENSION TO FILE FINAL BRIEFS

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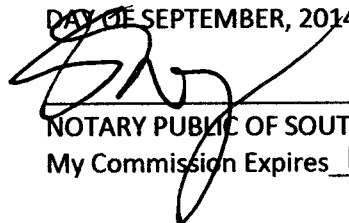
COMES NOW, Sally C. Dey, who being fully sworn, states the following facts, all within my personal knowledge:

1. I am co-counsel for the Appellant, Barbara Roehm.
2. I served the Record on Appeal on Opposing Counsel on August 18, 2014 and filed the Proof of Service regarding that with the Appellate Court on or around the same date.
3. Since serving the Record on Appeal, the parties have reached a settlement of the case which, when consummated, will dispose of all of the issues in this appeal.
4. The parties need additional time to consummate the settlement and all parties have agreed to an sixty (60) day extension of time within which to file Final Briefs and the Final Record on Appeal in this case.
5. The parties anticipate that after the settlement is consummated, this appeal will be withdrawn by the Appellate and she will ask that it be dismissed and remanded to the trial court.
6. Appellant is requesting, with the consent of Respondent, by and through her counsel of record, that a sixty (60) day extension be granted to allow for the parties to consummate the settlement of this case.

FURTHER AFFIANT SAYETH NOT!

  
\_\_\_\_\_  
SALLY C. DEY  
*Attorney for Appellant*

SWORN TO BEFORE ME ON THIS 9<sup>th</sup>  
DAY OF SEPTEMBER, 2014

  
\_\_\_\_\_  
NOTARY PUBLIC OF SOUTH CAROLINA  
My Commission Expires 11-12-15

IN THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS  
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Defendants Of Whom Leigh McKenzie, MD, Coastal Psychiatry, LLC and Charla McEachin Napier, LMFT  
are.....Respondents.

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Proof of Service

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I, Sally C. Dey, certify that on September 9, 2014 I caused Appellant's Motion for an Extension to File Final Briefs and Final Record on Appeal and Affidavit of Sally C. Dey in Support of Motion to be served upon the following parties, by dropping a true and exact copy in the US Mail, with proper postage affixed thereto.

Paul E. Tinkler, Esq.  
154 King Street  
Third Floor  
Charleston, SC 29401

D. Gary Lovell Jr., Esq.  
Carlock Copeland & Stair  
40 Calhoun Street  
Suite 400  
Charleston, SC 29401

  
SALLY C. DEY

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SEP 10 2014

**SC Court of Appeals**

**LAW OFFICE OF SALLY C. DEY**

**3 Gamecock Avenue  
Suite 306  
Charleston, SC 29407  
(843) 814-1695**

*Sally C. Dey,  
Attorney and Counselor at Law*

*Admitted in SC and CA  
sally@deylaw.net*

September 9, 2014

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

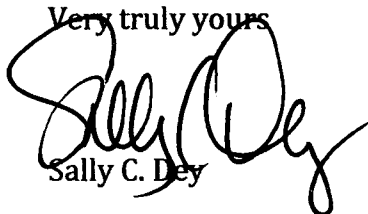
Re: Barbara Roehm v. Leigh McKenzie, MD, et al.  
Appellate Case No. 2013-001903

Dear Ms. Kitchings:

Enclosed please find an original Motion for an Extension to file Final Briefs and Record on Appeal, Affidavit of Sally C. Dey in Support of Motion, Proof of Service regarding service upon all interested parties in this case, along with a check for \$25 for the filing fee.

Thank you in advance for your time and consideration in this regard.

Very truly yours



Sally C. Dey

SCD/hs

cc: D. Gary Lovell, Jr., Esq.  
Paul Tinkler, Esq.

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SEP 10 2014  
SC Court of Appeals

Sally C Day  
3 Gamecock Ave #306  
Chas., SC 29407

CHARLESTON SC 294

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SC Court of Appeals

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

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