

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

KRISTI LEA HARRINGTON, Circuit Court Judge

13575

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SC Court of Appeals

Appellate Case No.: 2013-002177
Case No. 2012-CP-10-5366
(NOI) and 2013-CP-10-4475

JOHNNY EADES AND BARBARA EADES. Appellants,

v.

PALMETTO CARDIOVASCULAR AND THORACIC, PA; JAMES M. BENNER, MD;
MARK J. EPLER, MD; TRIDENT MEDICAL CENTER, LLC; COLUMBIA/HCA
HEALTHCARE CORPORATION OF SOUTH CAROLINA; HCA HEALTHCARE-SOUTH
CAROLINA; TRIDENT MEDICAL CENTER; TRIDENT HEALTH SYSTEM; PALMETTO
PRIMARY CARE PHYSICIANS, LLC; TRIDENT EMERGENCY PHYSICIANS, LLC;
BRIAN R. WHIRRETH, MD; PATRICIA CAMPBELL, MD; CHRISTINE E. MCNEAL,
MD; MATTHEW WALLEN, MD; CHARLESTON RADIOLOGISTS, PA; JOSEPH M.
MULLANE, MD; TRI-COUNTY RADIOLOGY ASSOCIATES, PA; AND
TROY MARLON, MD, Defendants;

OF WHOM

PALMETTO CARDIOVASCULAR AND THORACIC, PA; JAMES M. BENNER, MD;
MARK J. EPLER, MD; PALMETTO PRIMARY CARE PHYSICIANS, LLC; AND,
TRIDENT EMERGENCY PHYSICIANS, LLC, Respondents.

MOTION TO EXTEND TIME FOR RECORD ON APPEAL

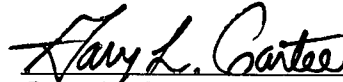
The Appellants hereby move for an Order extending by two weeks the time for filing the Record on Appeal. This Motion is made on the ground that Counsel for the Appellants has had dental surgery and complications from dental surgery which have made it impossible complete the Record on Appeal within the time previously allowed. This is an extraordinary, and, hopefully, singular problem. This motion is made on the

additional grounds that the Record on Appeal in this case involves a number of disparate documents in addition to the court reporter's transcript which makes preparation of the Record on Appeal complex, Counsel for the Appellants has a very heavy work load at this time, Counsel for the Appellants has not prepared a Record on Appeal in over a decade, and the additional time is very much needed. The Record on Appeal is currently due on September 19, 2014, and a two week extension would result in a due date of October 3, 2014.

Appellate Counsel for all of the Respondents have consented to this request.

Respectfully submitted,

September 16, 2014.



Gary L. Cartee
3251 Landmark Drive, Suite 136
N. Charleston, SC 29418
(843) 767-1800
Attorney for Appellants

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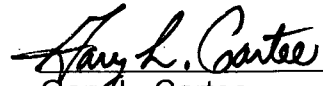
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MARK J. EPLER, MD; PALMETTO PRIMARY CARE PHYSICIANS, LLC; AND,
TRIDENT EMERGENCY PHYSICIANS, LLC, Respondents.

PROOF OF SERVICE

I certify that I have served the Motion To Extend Time For the Record on Appeal
in this matter by depositing copies in the United States Mail, postage prepaid on
September 16, 2014, addressed to the Respondents' appellate counsel as follows: R.
Hawthorne Barrett, Esq., Turner Padgett, PO Box 1473, Columbia, SC 29202; and

Andrew F. Lindemann, Esq., Davidson & Lindemann, P.A., PO Box 8568, Columbia, SC 29202.

September 16, 2014

A handwritten signature in cursive script that reads "Gary L. Cartee". The signature is written in black ink and is positioned above a horizontal line.

Gary L. Cartee
3251 Landmark Drive, Suite 136
N. Charleston, SC 29418
(843) 767-1800
Attorney for Appellants

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September 16, 2014

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

RE: Johnny Eades v. Palmetto Cardiovascular
Appellate Case No.: 2013-002177

Dear Ms. Kitchings:

Enclosed please find the original and one copy of the Appellants' Motion requesting a two week extension of time to file the Record on Appeal together with Proof of Service in the above referenced appeal.

My firm check in the amount of \$25.00 is enclosed for the required fee.

Please send me one clocked copy of the Motion and Proof of Service in the enclosed stamped, self-addressed envelope.

Respectfully submitted,



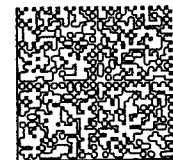
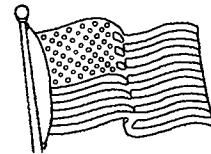
Gary L. Cartee

cc: (w/Enclosures)

R. Hawthorne Barrett, Esq.
Turner Padgett
PO Box 1473
Columbia, SC 29202

Andrew F. Lindemann, Esq.
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GARY L. CARTEE
 ATTORNEY AT LAW
 3251 Landmark Dr., Suite 136
 N. Charleston, S.C. 29418

TO:

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

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