

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

RECEIVED

SEP 17 2014

APPEAL FROM THE ADMINISTRATIVE LAW COURT
Ralph King Anderson III, Administrative Law Judge

SC Court of Appeals
173569

Case No. 2012-ALJ-07-0090-CC

Grand Strand Regional Medical Center, LLCRespondent,

v.

South Carolina Department of Health and Environmental Control.....Respondent below.

Case No. 2012-ALJ-07-0091-CC

Grand Strand Regional Medical Center, LLCRespondent,

v.

South Carolina Department of Health and Environmental Control
and Carolina Regional Cancer Center..... Respondents below,

Of whom Carolina Regional Cancer Center is the.....Appellant.

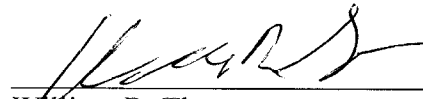
**GRAND STRAND REGIONAL MEDICAL CENTER, LLC'S
MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF
AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD**

Pursuant to Rule 240(a), SCACR, Respondent Grand Strand Regional Medical Center, LLC respectfully requests an extension of time of thirty (30) days to file its Initial Brief and Designation of Matter to be Included in the Record. The current due date unfortunately falls at a time when Respondent's counsel is committed to several litigation and regulatory matters including depositions, alternative dispute resolution, and

regulatory filings related to a significant program delay by the South Carolina Department of Health and Environmental Control. Respondent thus requests this extension to ensure that counsel has adequate time to review the two thousand-plus page record and prepare a thorough brief to this Court in response to Appellant's initial brief.

WHEREFORE, Respondent respectfully requests an order granting an extension of thirty (30) days to file its Initial Brief and Designation, up to and including November 4, 2014.

Respectfully submitted,



William R. Thomas
Walter H. Cartin
Amber B. Carter
Parker Poe Adams & Bernstein LLP
1201 Main Street, Suite 1450 (29201)
Post Office Box 1509
Columbia, South Carolina 29202
Telephone: 803.255.8000
Facsimile: 803.255.8017
E-mail: willthomas@parkerpoe.com
E-mail: waltcartin@parkerpoe.com
E-mail: ambercarter@parkerpoe.com

*Attorneys for Respondent
Grand Strand Regional Medical Center, LLC*

September 17, 2014

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

RECEIVED

SEP 17 2014

SC Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT
Ralph King Anderson III, Administrative Law Judge

Case No. 2012-ALJ-07-0090-CC

Grand Strand Regional Medical Center, LLCRespondent,

v.

South Carolina Department of Health and Environmental Control.....Respondent below.

Case No. 2012-ALJ-07-0091-CC

Grand Strand Regional Medical Center, LLCRespondent,

v.

South Carolina Department of Health and Environmental Control
and Carolina Regional Cancer Center..... Respondents below,

Of whom Carolina Regional Cancer Center is the..... Appellant.

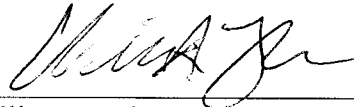
PROOF OF SERVICE

The undersigned hereby certifies that on September 17, 2014 s/he has caused a copy of Grand Strand Regional Medical Center, LLC's Motion for Extension of Time to File Initial Brief and Designation of Matter to be Included in the Record to be served upon all parties of record by hand delivering a copy of the same, addressed as follows:

James G. Long, III, Esquire
Jennifer J. Hollingsworth, Esquire
Tanya A. Gee, Esquire
Nexsen Pruet, LLC
1230 Main Street, Suite 700 (29201)
Post Office Drawer 2426
Columbia, South Carolina 29202

Edward Wade Mullins, III, Esquire
Bruner Powell
1735 St. Julian Place, Suite 200 (29204)
Post Office Box 61110
Columbia, South Carolina 29260-1110

Ashley C. Biggers, Esquire
Vito Wicevic, Esquire
South Carolina Department of Health
and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201



William R. Thomas
Walter H. Cartin
Amber B. Carter
Parker Poe Adams & Bernstein LLP
1201 Main Street, Suite 1450 (29201)
Post Office Box 1509
Columbia, South Carolina 29202
Telephone: 803.255.8000
Facsimile: 803.255.8017
E-mail: willthomas@parkerpoe.com
E-mail: waltcartin@parkerpoe.com
E-mail: ambercarter@parkerpoe.com

*Attorneys for Respondent
Grand Strand Regional Medical Center, LLC*



William R. Thomas
Partner
Telephone: 803.253.8658
Direct Fax: 803.255.8017
willthomas@parkerpoe.com

Charleston, SC
Charlotte, NC
Columbia, SC
Raleigh, NC
Spartanburg, SC

September 17, 2014

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

***Re: Appellate Case No. 2014-000973
Grand Strand Regional Medical Center, LLC v. South Carolina Department of
Health and Environmental Control and Carolina Regional Cancer Center***

Dear Ms. Kitchings:

Enclosed please find an original and six copies of Respondent Grand Strand Regional Medical Center, LLC's Motion for Extension of Time to File Initial Reply Brief and Designation of Matter to be Included in the Record in the above-referenced matter. I have also enclosed our Firm's check in the amount of \$25.00 in satisfaction of the Court's filing fee, and a Proof of Service indicating service of the Motion on all counsel of record.

Should you have any questions regarding this matter, please do not hesitate to contact me. With best regards, I am

Sincerely,

William R. Thomas

WRT/ccq
Enclosures

cc: James G. Long, III, Esquire (*with enclosure via hand delivery*)
Jennifer J. Hollingsworth, Esquire (*with enclosure via hand delivery*)
Tanya A. Gee, Esquire (*with enclosure via hand delivery*)
Edward Wade Mullins, III, Esquire (*with enclosure via hand delivery*)
Ashley C. Biggers, Esquire (*with enclosure via hand delivery*)
Vito Wicevic, Esquire (*with enclosure via hand delivery*)

RECEIVED

SEP 17 2014

SC Court of Appeals

PPAB 2566022v1