

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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

**RECEIVED**  
SEP 26 2014  
**SC Court of Appeals**

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

Grand Strand Regional Medical Center, LLC..... Respondent,

v.

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

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

Grand Strand Regional Medical Center, LLC..... Respondent,

v.

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

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


\_\_\_\_\_  
**SOUTH CAROLINA DEPARTMENT OF HEALTH AND  
ENVIRONMENTAL CONTROL'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 below South Carolina Department  
of Health and Environmental Control 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. Respondent's deadline for filing its Initial Brief and Designation of Matter falls at a time when Respondent's counsel is preparing for an October 7, 2014, oral argument before the Court of Appeals in another matter. Additionally, in response to the request for extension filed by Respondent Grand Strand Regional Medical Center, LLC, Respondent Department seeks to coordinate the briefing schedules through the filing of this motion for an extension.

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

Respectfully submitted,



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W. Marshall Taylor, Esquire (SC Bar #16646)  
Ashley C. Biggers, Esquire (SC Bar No.: 17225)  
Vito M. Wicevic, Esquire (SC Bar No.: 100265)  
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Environmental Control  
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September 26, 2014

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

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

CERTIFICATE OF SERVICE

I, Jaimie Presley Jones, with the Office of General Counsel with the South Carolina Department of Health and Environmental Control, do hereby certify that I have on this 26th day of September, 2014, served a copy of DHEC's Motion for Extension of Time to File Initial Brief and Designation of Matter to be Included in the Record upon all

parties and counsel of record in the above-captioned case, via Electronic Mail and United States Mail, First Class, postage prepaid, addressed as follows:

*Parties of Record*

**James G. Long, III, Esquire**  
**Jennifer J. Hollingsworth, Esquire**  
**Tanya A. Gee, Esquire**  
Nexsen Pruet, LLC  
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**William R. Thomas, Esquire**  
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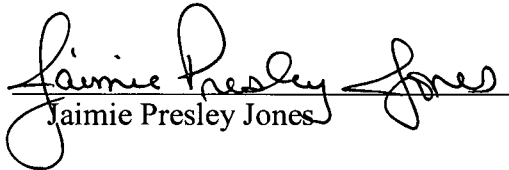
-and-

**E. Wade Mullins, Esquire**  
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*Attorneys for Respondent Grand  
Strand Regional Medical Center,  
LLC*

*Attorneys for Appellant Carolina Regional  
Cancer Center*

**SOUTH CAROLINA DEPARTMENT OF HEALTH  
AND ENVIRONMENTAL CONTROL**

By:   
Jaimie Presley Jones

Date: September 26<sup>th</sup>, 2014



Catherine B. Templeton, Director

*Promoting and protecting the health of the public and the environment*

September 26, 2014

**VIA HAND DELIVERY**

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

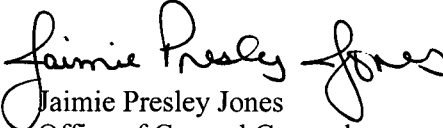
RE: Appellate Case No.: 2014-000973  
Grand Strand Regional Medical Center, LLC v. South Carolina Department of Health and  
Environmental Control and Carolina Regional Cancer Center  
OGC# 21336.1

Dear Ms. Kitchings:

Enclosed please find the original and six copies of **Respondent South Carolina Department of Health and Environmental Control's Motion for Extension of Time to File Initial Brief and Designation of Matter to be included in the Record** along with a **Proof of Service** in the above-referenced matter.

Should you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

  
Jaimie Presley Jones  
Office of General Counsel

Enclosure

cc: James G. Long, III, Esquire  
Jennifer J. Hollingsworth, Esquire  
Tanya A. Gee, Esquire  
E. Wade Mullins, Esquire

William R. Thomas, Esquire  
Walter H. Cartin, Esquire  
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