

RECEIVED

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

OCT 27 2014

SC Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Shirley C. Robinson, Administrative Law Judge

73963

Case No. 12-ALJ-17-0405-AP

Appellate Case No. 2014-001457

CareAlliance Health Services d/b/a Roper St. Francis Respondent,
Healthcare,

v.

South Carolina Department of Revenue, Appellant.

**SECOND MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S
INITIAL BRIEF AND DESIGNATION OF MATTER**

Pursuant to Rules 208(a)(2), 209 and 240 of the South Carolina Appellate Court Rules, Respondent CareAlliance Health Services d/b/a Roper St. Francis Healthcare (“Roper”), requests a thirty (30) day extension of time to file its Initial Brief and Designation of Matter in the above-captioned matter. This is the second request for an extension of this deadline.

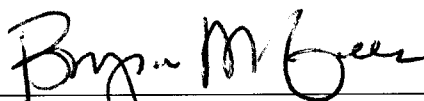
This request is necessitated because local counsels' court schedule and other briefing deadlines as well as lead counsel being on a teaching sabbatical out of the country will not allow them to complete the Respondent's Initial Brief and Designation within the current deadline. Currently, Roper's Initial Brief and Designation are due on

November 3, 2014. With the additional thirty (30) day extension, Roper's Initial Brief and Designation will be due on December 3, 2014, per Rule 263, SCACR.

Counsel for Appellant South Carolina Department of Revenue does not object to this extension.

Therefore, Roper respectfully moves this Court for a thirty (30) day extension of time to file its Initial Brief of Respondent and Designation of Matter in the above-captioned matter until December 3, 2014. Roper asks that the current deadline be held in abeyance pending the Court's consideration and resolution of this motion.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 

John C. von Lehe, Jr.
SC Bar No. 5719
E-Mail: john.vonlehe@nelsonmullins.com
Bryson M. Geer
SC Bar No. 13606
E-Mail: bryson.geer@nelsonmullins.com
151 Meeting Street / Sixth Floor
Post Office Box 1806 (29402-1806)
Charleston, SC 29401-2239
(843) 853-5200

Raymond P. Carpenter, Esq.
(admitted pro hac vice)
E-Mail: rcarpenter@rclaw.us.com
Raymond P. Carpenter and Associates, LLC
625 Colonial Park Drive, Suite 201
Roswell, GA 30075
(770) 998-2722

Attorneys for Respondent

Charleston, South Carolina
October 22, 2014

The Honorable Jenny Abbott Kitchings

October 22, 2014

Page 2

bcc: Raymond P. Carpenter (rcarpenter@rclaw.us.com)
Steve Mathis (smathis@colonial.us.com)
Britt Dobbins (bdobbins@colonial.us.com)
John C. Von Lehe, Jr.

Nelson Mullins

Nelson Mullins Riley & Scarborough LLP

Attorneys and Counselors at Law
151 Meeting Street / Sixth Floor / Charleston, SC 29401-2239
Tel: 843.853.5200 Fax: 843.722.8700
www.nelsonmullins.com

Bryson M. Geer
(Admitted in NC & SC)
Tel: 843.720.4306
bryson.geer@nelsonmullins.com

October 22, 2014

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

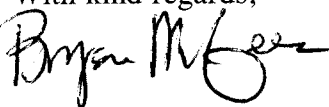
RE: CareAlliance Health Services d/b/a Roper St. Francis Healthcare v. South
Carolina Department of Revenue
Docket No.: 12-ALJ-17-0405-CC
Appellate Case No. 2014-001457
Our file No.: 38103/09000

Dear Ms. Kitchings:

Enclosed please find the original and seven copies of Respondent's Second Motion for Extension of Time to File Initial Brief and Designation of Matter in the above-referenced matter. We would ask that you file the original and return a clocked-in copy to us in the envelope provided. Also enclosed is our check in the amount of \$25.00 as the required filing fee.

By copy of this letter, we are serving this Second Motion for Extension of Time on counsel for Appellant South Carolina Department of Revenue, who has no objection to this extension.

Thank you for your assistance.

With kind regards,


Bryson M. Geer

BMG:dh
Enclosure
cc: Lauren Acquaviva, Esq. (w/enclosure)



RECEIVED

OCT 27 2014

SC Court of Appeals

Abbott Kitchings
South Carolina Court of Appeals
c 11629
olumbia, SC 29211

