

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

174239

RECEIVED

NOV 21 2014

SC Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Steven H. John, Circuit Court Judge

Case No. 2011-CP-26-7403

Randall M. Green and Ann Green,.....Respondents-Appellants,

v.

Wayne B. Bauerle, M.D. and

Wayne B. Bauerle, M.D., P.C.,.....Appellants-Respondents.

REQUEST FOR EXTENSION

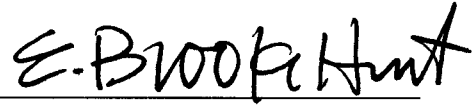
COMES NOW Respondents/Appellants, Randall M. Green and Ann Green, by and through their undersigned counsel, and respectfully move this Honorable Court for a thirty-day extension of the filing date of the Final Briefs of Respondents/Appellants from November 20, 2014 to December 22, 2014.

Although this Honorable Court has already granted Respondents/Appellants and Appellant/Respondent a twenty-day extension to file their Final Briefs, Respondents/Appellants still have not received the Record of Appeal from Appellants/Respondents, preventing Respondents/Appellants from completing this brief by the current deadline of November 20, 2014.

WHEREFORE, Respondents/Appellants respectfully request this Court issue an order extending the filing date of the Respondents-Appellants Final Briefs from November 20, 2014 to December 22, 2014.

November 18, 2014

Respectfully submitted,



O. Grady Query, Esquire
Elizabeth Brooke Hurt, Esquire
Query Sautter Forsythe, LLC
The Wappoo Centre
147 Wappoo Creek Drive, Suite 202
Charleston, South Carolina 29413
(843) 795-9500

L. Morgan Martin, Esquire
L. Morgan Martin, PA
1121 Third Avenue
Conway, South Carolina 29526
(843) 248-3177

Cristin Uricchio, Esquire
Uricchio Law Firm
The Wappoo Centre
147 Wappoo Creek Drive, Suite 205
Charleston, South Carolina 29412
(843) 795-9300

Counsel for Respondents-Appellants

Other Counsel of Record:

John B. McCutcheon, Jr., Esquire
Lisa A. Thomas, Esquire
Thompson & Henry, PA
1300 Second Avenue, Third Floor
Post Office Box 1740
Conway, South Carolina 29528
(843) 248-5741

Andrew F. Lindemann, Esquire
Davidson & Lindemann, P.A.
1611 Devonshire Drive
Post Office Box 8568
Columbia, South Carolina 29202
(803) 806-8222

Counsel for Appellants-Respondents

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Steven H. John, Circuit Court Judge

RECEIVED

NOV 21 2014

SC Court of Appeals

Case No. 2011-CP-26-7403

Randall M. Green and Ann Green,.....Respondents/Appellants,

v.

Wayne B. Bauerle, M.D. and

Wayne B. Bauerle, M.D., P.C.,.....Appellants/Respondents.

PROOF OF SERVICE

I certify that I have served Respondents/Appellants' Motion for Extension on Wayne B. Bauerle, M.D. and Wayne B. Bauerle, M.D., P.C. by depositing a copy of it in the United States Mail, postage prepaid, on November 19, 2014 addressed to his attorneys of record at their offices as follows:

John B. McCutcheon, Jr., Esquire
Lisa A. Thomas, Esquire
Thompson & Henry, P.A.
Post Office Box 1740
Conway, South Carolina 29528

Andrew F. Lindemann, Esquire
Davidson & Lindemann, P.A.
Post Office Box 8568
Columbia, South Carolina 29202

November 19, 2014

E. Brooks Hurt

O. Grady Query, Esquire
Michael W. Sautter, Esquire
Michèle Patrão Forsythe, Esquire
Elizabeth Brooks Hurt, Esquire
Query Sautter Forsythe, LLC
147 Wappoo Creek Drive, Suite 202
Charleston, South Carolina 29412
(843) 795-9500

L. Morgan Martin, Esquire
L. Morgan Martin, PA
1121 Third Avenue
Conway, South Carolina 29526
(843) 248-3177

Cristin Uricchio, Esquire
Uricchio Law Firm
The Wappoo Centre
147 Wappoo Creek Drive, Suite 205
Charleston, South Carolina 29412
(843) 795-9300

Counsel for Respondents/Appellants

Charleston, South Carolina

QUERY SAUTTER FORSYTHE, LLC

ATTORNEYS AND COUNSELORS AT LAW

The Wappoo Centre
147 Wappoo Creek Drive
Suite 202

Charleston, South Carolina 29412

Telephone 843.795.9500

Facsimile 843.762.1500

O. Grady Query*

*Certified Circuit Court Arbitrator and Mediator

*Certified National Trial Advocacy Civil Trial Specialist

Michael W. Sautter**

**Managing Partner

Michèle Patrão Forsythe***

***Certified Family Court Mediator

Elizabeth Brooke Hurt

November 18, 2014

RECEIVED

NOV 21 2014

SC Court of Appeals

Via U.S. Mail

The Honorable Jenny Abbott Kitchings

Clerk of Court

South Carolina Court of Appeals

Post Office Box 11629

Columbia, South Carolina 29211

RE: Randall M. Green and Ann Green, Respondents/Appellants v. Wayne B. Bauerle, M.D. and Wayne B. Bauerle, M.D., PC, Appellants/Respondents,
Civil Action No. 2011-CP-26-7403
Appellate Case No. 2014-000469

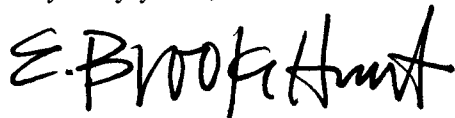
Dear Ms. Kitchings:

This letter is to request an additional thirty day extension of time to file the Final Briefs of Respondents-Appellants in the above referenced appeal. Respondents-Appellants were initially served with the Record on Appeal on October 1, 2014, making the Final Briefs of Respondents-Appellants due on October 20, 2014. This Honorable Court granted all parties an extension to file their Final Briefs on the grounds that changes were made to the Record on Appeal and the Record on Appeal was not ready prior to October 20, 2014. Respondents-Appellants still have not received the Record on Appeal, and on that basis respectfully request a continuance for an additional 30 days until Appellants-Respondents furnish Respondent-Appellants with the Record on Appeal or. If the Court is in agreement, the Final Briefs of Respondents-Appellants will be due 30 days from November 20, 2014, that being December 22, 2014.

Enclosed please find a check for the filing fee in the amount of \$25.00. Your attention to this request is greatly appreciated. Should you have any questions, please do not hesitate to contact this office.

With kindest regards, I remain,

Very truly yours,



Brooke Hurt

Enclosures

cc: L. Morgan Martin, Esquire
L. Morgan Martin, PA
1121 Third Avenue
Conway, South Carolina 29526
(843) 248-3177

Cristin Uricchio, Esquire
Uricchio Law Firm
The Wappoo Centre
147 Wappoo Creek Drive, Suite 205
Charleston, South Carolina 29412
(843) 795-9300

John B. McCutcheon, Jr., Esquire
Lisa A. Thomas, Esquire
Thompson & Henry, PA
1300 Second Avenue, Third Floor
Post Office Box 1740
Conway, South Carolina 29528
(843) 248-5741

Andrew F. Lindemann, Esquire
Davidson & Lindemann, P.A.
1611 Devonshire Drive
Post Office Box 8568
Columbia, South Carolina 29202
(803) 806-8222

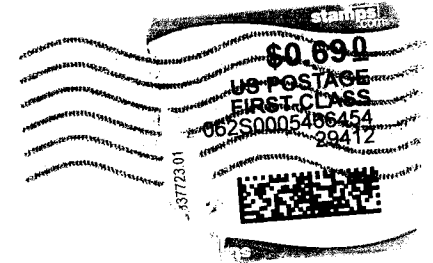
QUERY SAUTTER FORSYTHE, LLC

ATTORNEYS AND COUNSELORS AT LAW

Query Sautter Forsythe, LLC
147 Wappoo Creek Drive, Suite 202
Charleston, South Carolina 29412

CHARLESTON SC 294

19 NOV 2014 PM 2 T



RECEIVED

NOV 21 2014

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

29211+1629

