

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

Case No. 2011-CP-10-0934

RECEIVED

FEB 04 2015

SC Court of Appeals

174945

Virginia L. Marshall and
Todd W. Marshall, Appellants,

v.

Kenneth A. Dodds, M.D., Charleston
Nephrology Associates, LLC, Georgia
Roane, M.D., and Rheumatology
Associates, P.A., Respondents.

MOTION FOR TEMPORARY STAY

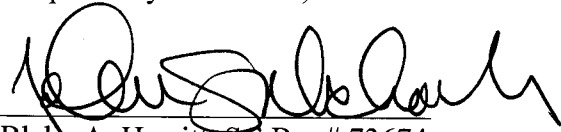
Pursuant to Rule 240, SCACR, the appellants request a temporary stay of the deadline for filing their initial reply brief.

There are two sets of respondents in this appeal. Dr. Dodds and his practice have filed their respondents' brief, but the remaining respondents (Georgia Roane, M.D., and Rheumatology Associates, P.A.) have requested an extension. The appellants consented to this extension request.

In order to conserve resources, the appellants wish to file only one reply brief. They accordingly respectfully request that the Court temporarily stay the deadline to file their initial reply brief until all respondents have filed initial briefs.

February 4, 2015

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Blake A. Hewitt", written over a horizontal line.

Blake A. Hewitt, SC Bar # 73674

John S. Nichols, SC Bar # 4210

BLUESTEIN NICHOLS

THOMPSON & DELGADO

Post Office Box 7965

Columbia, South Carolina 29202

Attorneys for Appellants

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PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel for the Respondents with a copy of the *Motion for Temporary Stay* by mailing copies of the same by United States Mail with first class postage prepaid to the following addresses:

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Erin Bridges
BLUESTEIN, NICHOLS, THOMPSON
& DELGADO, LLC

February 4, 2015
Columbia, South Carolina



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC
ATTORNEYS AT LAW

February 4, 2015

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SC Court of Appeals

VIA HAND DELIVERY

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

RE: Marshall v. Dodds
Case Tracking No.: 2014-001833

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a *Motion for Temporary Stay* in reference to the above matter. I have also enclosed a proof of service of this document on counsel for the Respondents and a \$25.00 check for filing this motion. Please return the additional filed copy to me via our courier.

Thank you for your attention to this matter. If you need any additional information, please to not hesitate to contact me.

Sincerely,

Erin Bridges
Paralegal to Blake Hewitt
BLUESTEIN, NICHOLS,
THOMPSON & DELGADO, LLC

/emb

Enclosures

cc: J. Edward Bell, III, Esquire
C. Carter Elliott, Jr., Esquire
Deborah H. Sheffield, Esquire
James B. Hood, Esquire
Thomas R. Goldstein, Esquire
D. Jay Davis, Jr., Esquire