

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

---

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.

---

**CONSENT MOTION FOR THIRD BRIEFING EXTENSION**  
**BY RESPONDENTS GEORGIA ROANE, M.D. AND**  
**RHEUMATOLOGY ASSOCIATES, P.A.**

---

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
James E. Scott, IV (SC Bar No. 09063)  
Perry M. Buckner, IV (SC Bar No. 100031)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488  
*Attorneys for Respondents*  
*Georgia Roane, M.D. and*  
*Rheumatology Associates, P.A.*

**RECEIVED**

MAR 04 2015

**SC Court of Appeals**

75241

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA  
COURT OF APPEALS

COME NOW Respondents Georgia Roane, M.D. and Rheumatology Associates, P.A., by and through their undersigned counsel, pursuant to Rules 240 and 263, SCACR, and, upon the grounds set forth herein, move this Honorable Court for a 2-day extension of these Respondents' present deadline (which is March 2, 2015) to file and serve their initial brief and corresponding designation of matter to be included in the record on appeal.

1. Appellants served their initial brief on December 1, 2014, making the deadline for these Respondents' initial brief and designation of matter December 31, 2014, pursuant to Rules 208(a)(2) and 209(a), SCACR.

2. By Orders of this Court dated January 7, 2015, and February 5, 2015, these Respondents' deadline for filing and serving their initial brief and designation of matter was extended. As established by the most recent of these Orders, the present deadline is today, March 2, 2015.

3. The undersigned is, of course, aware that the Court's February 5, 2015, Order advised that "[n]o further extensions will be granted absent extraordinary circumstances," and the undersigned does not make the instant motion lightly.

4. Rather, and, to be sure, the undersigned makes this motion most respectfully—indeed, most humbly—submitting that this motion is

occasioned by circumstances that can fairly be viewed as extraordinary and that the relief requested herein is consistent with the interests of justice, will not cause any material delay of this matter, and will not prejudice Appellants.

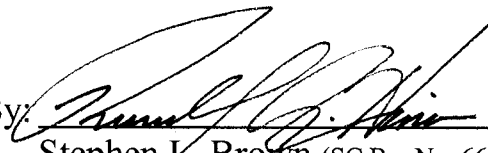
5. Prior to making this motion, the undersigned consulted with Appellants' counsel Blake A. Hewitt, Esquire, who has kindly authorized the undersigned to represent to the Court that **Appellants have no objection to the extension of time requested herein.**

6. Yesterday, shortly before midnight, the undersigned returned home from a family vacation (to Disney World). The undersigned had begun preparation of these Respondents' initial brief before departing on this trip (last Tuesday morning) and had planned to finalize the brief for filing/service via mail today. It has become apparent to the undersigned, however, that, on account of the abbreviated work schedule and related time commitments/constraints (both work-related and non-work-related) associated with this trip (to include attending to other matters upon return therefrom), the aforementioned plan was overly ambitious and that a modest allowance of additional time will be of considerable benefit to the undersigned in fully addressing the question(s) presented to the Court in this appeal.

WHEREFORE, these Respondents move this Honorable Court for a 2-day extension (from March 2, 2015) of their deadline to file and serve their initial brief and designation of matter. If the Court grants the requested extension, the new deadline for the Respondents' initial brief and designation of matter will be Wednesday, March 4, 2015. Lastly, Respondents request that the Court hold their present deadline for initial briefing/designation of matter in abeyance until it acts upon this motion.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By:   
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
James E. Scott, IV (SC Bar No. 09063)  
Perry M. Buckner, IV (SC Bar No. 100031)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488  
*Attorneys for Respondents*  
*Georgia Roane, M.D. and*  
*Rheumatology Associates, P.A.*

Charleston, South Carolina

Dated: 3/2/15

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Respondents Georgia Roane, M.D. and Rheumatology Associates, P.A., do hereby certify that I have served the **CONSENT MOTION FOR THIRD BRIEFING EXTENSION BY RESPONDENTS GEORGIA ROANE, M.D. AND RHEUMATOLOGY ASSOCIATES, P.A.** on all other parties to this appeal by depositing copies of the same in the United States Mail, postage prepaid, on March 2, 2015, addressed as follows to their counsel of record:

Blake A. Hewitt, Esquire  
John S. Nichols, Esquire  
Bluestein Nichols Thompson Delgado, LLC  
P.O. Box 7965  
Columbia, SC 29202

***-and-***

J. Edward Bell, III, Esquire  
Bell Legal Group, LLC  
P.O. Box 2590  
Georgetown, SC 29442

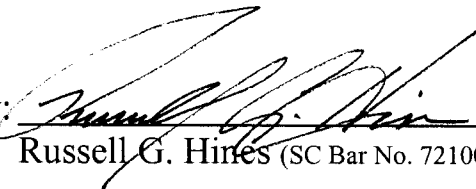
***-and-***

C. Carter Elliott, Jr., Esquire  
Elliott & Phelan, LLC  
P.O. Box 1405  
Georgetown, SC 29442  
***Attorneys for Appellants***  
***Virginia L. Marshall and Todd W. Marshall***

James B. Hood, Esquire  
Robert H. Hood, Esquire  
H. Cooper Wilson, III, Esquire  
Deborah Harrison Sheffield, Esquire  
Hood Law Firm, LLC  
172 Meeting Street  
Charleston, SC 29401  
*Attorneys for Respondents*  
*Kenneth A. Dodds, M.D. and*  
*Charleston Nephrology Associates, LLC*

Thomas R. Goldstein, Esquire  
Belk, Cobb, Infinger & Goldstein, P.A.  
P.O. Box 71121  
Charleston, SC 29415-1121  
*Attorney for Respondent*  
*Kenneth A. Dodds, M.D.*

YOUNG CLEMENT RIVERS, LLP

By:   
Russell G. Hines (SC Bar No. 72100)

Charleston, South Carolina

Dated: 3/2/15

**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

---

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.

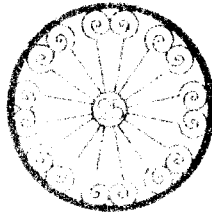
---

**PROOF OF SERVICE**

---

**RECEIVED**  
MAR 04 2015  
SC Court of Appeals

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
James E. Scott, IV (SC Bar No. 09063)  
Perry M. Buckner, IV (SC Bar No. 100031)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488  
*Attorneys for Respondents  
Georgia Roane, M.D. and  
Rheumatology Associates, P.A.*



**YCR LAW**

Young Clement Rivers, LLP

CELEBRATING 50 YEARS OF LEGAL SERVICE

**50 YEARS**

Aimee M. Justman  
Legal Assistant

Direct Dial: (843) 720-5460  
Direct Fax: (843) 579-1385  
E-mail: [Ajustman@ycrlaw.com](mailto:Ajustman@ycrlaw.com)

March 2, 2015

**VIA FACSIMILE AND US MAIL**

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: Virginia L. Marshall and Todd W. Marshall v. Kenneth A. Dodds, M.D.,  
Charleston Nephrology Associates, LLC, Georgia Roane, M.D. and  
Rheumatology Associates, P.A.  
Appellate Case No.: 2014-001833  
Circuit Case No.: 2011-CP-10-0934  
YCR File: 2466-20110384

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter, please find the original and seven (7) copies of a ***Consent Motion for Third Briefing Extension by Respondents Georgia Roane, M.D. and Rheumatology Associates, P.A.***, the original and two (2) copies of a ***Proof of Service*** regarding the same and a check in the amount of \$25.00.

Kindly file the original and return one court-stamped copy to me using the pre-stamped envelope provided. With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Aimee M. Justman  
Legal Assistant

/amj  
Enclosures

**RECEIVED**

MAR 04 2015

**SC Court of Appeals**

Jenny Abbott Kitchings, Clerk of Court

March 2, 2015

Page 2

cc: (All below via E-Mail and US Mail)

Blake A. Hewitt, Esquire, Bluestein Nichols Thompson Delgado, LLC

John S. Nichols, Esquire, Bluestein Nichols Thompson Delgado, LLC

J. Edward Bell, III, Esquire, Bell Legal Group, LLC

C. Carter Elliott, Jr., Esquire, Elliott & Phelan, LLC

James B. Hood, Esquire, Hood Law Firm, LLC

Robert H. Hood, Esquire, Hood Law Firm, LLC

H. Cooper Wilson, III, Esquire, Hood Law Firm, LLC

Thomas R. Goldstein, Esquire, Belk, Cobb, Infinger & Goldstein, P. A.

Hasler

FIRST-CLASS

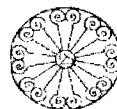
03/02/2015

US POSTAGE \$002.60



ZIP 29401  
011D12603

# FIRST CLASS MAIL



**YCRLAW**

25 Calhoun Street, Suite 400  
P.O. Box 993  
Charleston, SC 29402-0993

RGH  
2466-  
20110384

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**

MAR 11 2015

SC Court of Appeals

