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APR 24 2015
SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable D.Garrison Hill

Trial Court Case No.: 2011-CP-23-06665
Appellate case No. 2014-001973

Demetria Orange, as Next Friend of
J.B., a minor,Respondent-Appellant,

v.

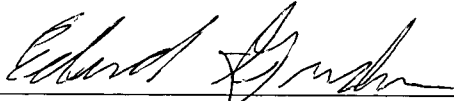
Greenville Hospital System and
Greenville Hospital System Partners in Health,.....Appellant-Respondent.

**JOINT MOTION FOR EXTENSION OF TIME TO
FILE THE INITIAL BRIEFS**

The parties to this cross-appeal hereby move the Court, pursuant to Rules 240 and 263, SCACR, for an extension of time for 30 days from the current deadline (April 28, 2015) to file their Initial Appellants' Briefs and Designations of Matter, or until **May 27, 2015**. In the meantime, the parties ask that the current filing deadlines be stayed pending resolution of this request.

Respectfully submitted,

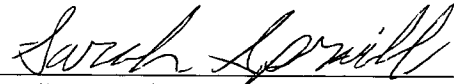
GRAHAM LAW FIRM, P.A.

By: 

Edward L. Graham
383 W. Cheves St.
Florence, SC 29501
843-662-3281-T
843-665-0254-F

Attorney for Respondent-Appellant

HAYNSWORTH SINKLER BOYD, PA

By: 

J. Ben Alexander, SC Bar No. 015323
Sarah P. Spruill, SC Bar No. 68337
Post Office Box 2048
Greenville, South Carolina 29602
864-240-3200

Attorneys for Appellant-Respondent

April 23, 2015

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable D.Garrison Hill

Trial Court Case No.: 2011-CP-23-06665
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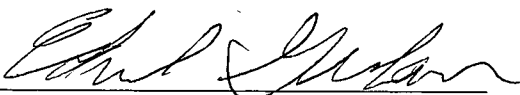
PROOF OF SERVICE

The undersigned, an attorney in this matter certifies that I have this **23rd day of April, 2015** served a copy of the **Motion for Extension of Time to File the Appellant's Initial Brief and Designation of Matter of the Appellant-Respondent and the Respondent-Appellant** upon counsel for the appellant-respondent by depositing in the United States mail, first-class postage prepaid addressed to:

J. Ben Alexander, Esq.
Sarah P. Spruill, Esq.
Post Office box 2048
Greenville, South Carolina 29602
Attorneys for Respondent

Respectfully submitted,

GRAHAM LAW FIRM, P.A.

By: 

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ATTORNEY FOR APPELLANTS

April 23, 2015

RECEIVED

APR 24 2015

SC Court of Appeals

April 23, 2015

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

**Re: Demetria Orange, as next Friend of J. B., a minor, Respondent v.
Greenville Hospital System, Appellant
Appellate Case No.: 2014-001973**

Dear Ms. Kitchings:

This firm represents the Respondent-Appellant in the above matter. Pursuant to Rule 263(b), SCACR, all parties to this cross-appeal respectfully request a 30 day extension of time in which to file the Initial Briefs and Designations, making them due May 27, 2015. The Appellant-Respondent joins in this request to extend deadlines for each party's respective Initial Briefs and Designations to May 27, 2015.

Enclosed please find my firm's check in the amount of \$25.00 along with the original and 6 copies of a Motion for Extension of Time to File the Initial Briefs and Designations. In the interim, we request that the current filing deadlines be stayed pending resolution of this request. As per the attached Proof of Service, we are serving all counsel of record with a copy of this request.

With kindest personal regards, I am

Sincerely,



Graham Law Firm, P.A.

Edward Graham

John Layton Ruffin

P.O. Box 550

Florence, SC 29503

Attorneys for Appellant