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APR 30 2015

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**SC Court of Appeals**

APPEAL FROM THE ADMINISTRATIVE LAW COURT  
The Honorable S. Phillip Lenski, Administrative Law Judge

Docket No. 2011-ALJ-07-0575-CC  
Appellate Case No. 2015-000056

Amisub of South Carolina, Inc. d/b/a Piedmont Medical Center  
d/b/a Fort Mill Medical Center ..... Respondent,

v.

South Carolina Department of Health and Environmental Control and The  
Charlotte-Mecklenburg Hospital Authority, d/b/a Carolinas Medical  
Center-Fort Mill ..... Respondents,

Of Whom The Charlotte-Mecklenburg Hospital Authority, d/b/a Carolinas  
Medical Center-Fort Mill, is..... Appellant.

RESPONDENT SOUTH CAROLINA DEPARTMENT OF HEALTH AND  
ENVIRONMENTAL CONTROL'S MOTION FOR EXTENSION OF TIME TO FILE  
RESPONDENT'S INITIAL BRIEF

Respondent South Carolina Department of Health and Environmental Control ("DHEC") hereby moves for an extension of fifteen (15) days to file initial briefs and designation of matter to be included into the record. Respondent DHEC's current deadline for filing the briefs is May 18, 2015. If granted, the requested extension would extend the deadline until June 2, 2015. Appellant has consented to this motion.

This appeal was filed by Appellant on January 14, 2015. Appellant obtained a thirty (30) day extension to file its initial brief, with the consent of the other parties. Appellant moved for a second thirty (30) day extension, to which DHEC consented but

which Piedmont opposed. The Court granted the Appellant an extension until April 17, 2015, noting in its March 18, 2005 Order: “No further extensions will be granted absent extraordinary circumstances.”

The grounds for Respondent’s motion are that the undersigned counsel have other commitments during the next month that require attention and that the additional time would allow Respondent to more fully respond to Appellant’s initial brief. This admittedly does not constitute extraordinary circumstances, but the Respondent understands the Court’s statement in the earlier order as intended to apply to Appellant, since at that point only Appellant had requested an extension.

Respectfully submitted,



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Ashley C. Biggers, Esquire (SC Bar No.: 17225)  
Vito M. Wicevic, Esquire (SC Bar No.: 100265)  
South Carolina Department of Health and  
Environmental Control  
2600 Bull Street  
Columbia, SC 29078  
P: (803) 898-3350  
F: (803) 898-3367

April 30, 2015  
Columbia, South Carolina

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Center-Fort Mill ..... Respondents,

Of Whom The Charlotte-Mecklenburg Hospital Authority, d/b/a Carolinas  
Medical Center-Fort Mill,  
is..... Appellant.

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**PROOF OF SERVICE**

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I, Donna K. Hellerman, with the South Carolina Department of Health and Environmental Control, do hereby certify that I have on this **30<sup>th</sup> day of April, 2015**, served a copy of **RESPONDENT SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL'S MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S INITIAL BRIEF** upon all parties and counsel of record in the above-captioned case, via Electronic Mail and United States Mail, First Class, postage prepaid, addressed as follows:

**Parties of Record**

**Daniel J. Westbrook, Esquire**  
**Stuart M. Andrews, Jr., Esquire**  
Nelson Mullins Riley & Scarborough, LLP  
P.O. Box 11070  
Columbia, SC 29211  
Email: dan.westbrook@nelsonmullins.com  
Email: stuart.andrews@nelsonmullins.com


*Attorneys for Amisub of SC, Inc. d/b/a Piedmont  
Medical Center d/b/a Fort Mill Medical Center*

**Douglas M. Muller, Esquire**  
**Trudy H. Robertson, Esquire**  
**E. Brandon Gaskins, Esquire**  
Moore & Van Allen PLLC  
P.O. Box 22828  
Charleston, SC 29413  
Email: dougmuller@mvalaw.com  
Email: trudyrobertson@mvalaw.com  
Email: brandongaskins@mvalaw.com

*Attorneys for The Charlotte Mecklenburg  
Hospital Authority, d/b/a Carolinas  
Medical Center --Fort Mill*

**SOUTH CAROLINA DEPARTMENT OF HEALTH  
AND ENVIRONMENTAL CONTROL**

By:

  
\_\_\_\_\_  
Donna K. Hellerman

Date: April 30<sup>th</sup>, 2015



W. Marshall Taylor Jr., Acting Director

*Promoting and protecting the health of the public and the environment*

April 30, 2015

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**SC Court of Appeals**

VIA HAND DELIVERY

**The Honorable Jenny Abbott Kitchings**

Clerk, South Carolina Court of Appeals

1220 Senate Street

Columbia, SC 29201

RE: Amisub of South Carolina, Inc. d/b/a Piedmont Medical Center d/b/a Fort Mill Medical Center v. South Carolina Department of Health and Environmental Control and The Charlotte-Mecklenburg Hospital Authority, d/b/a Carolinas Medical Center-Fort Mill  
Appellant No. : 2015-000056  
OGC# 21301.1

Dear Ms. Kitchings:

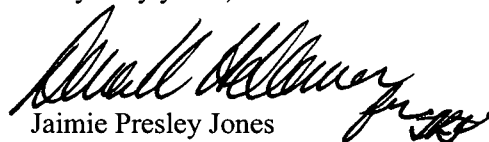
Enclosed for filing with your office are the originals and seven (7) copies of the following:

- 1. Respondent South Carolina Department of Health and Environmental Control's Motion for Extension of Time to File Respondent's Initial Brief*
- 2. Proof of Service*

Please return a clocked copy to the courier. By copy of this letter to all parties of record, I am enclosing the above for service.

Thank you for your assistance.

Very truly yours,



Jaimie Presley Jones  
Office of General Counsel

cc: Daniel J. Westbrook, Esquire  
Stuart M. Andrews, Esquire  
Douglas M. Muller, Esquire  
Trudy H. Robertson, Esquire  
E. Brandon Gaskins, Esquire