

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Michael J. Baxley, Circuit Court Judge

Case No.: 2007-CP-10-1553

RECEIVED

AUG 06 2012

SC Court of Appeals

Jamesetta Washington, as Guardian ad Litem, for
Jayden Washington, a minor,Appellants,

v.

Edmund Rhett, Jr., M.D., Low Country Obstetrics and Gynecology, P.A.; Tenet
South Carolina, Inc. d/b/a East Copper Regional Medical Center and AMN
Services, Inc. f/k/a Nurses RX Inc,.....Defendants,

Of Whom Edmund Rhett, Jr. MD is.....Respondent

**MOTION FOR EXTENSION OF TIME TO
FILE REPLY BRIEF OF APPELLANT**

COMES NOW, the Appellant, Jamesetta Washington, as Guardian ad Litem for Jayden Washington, a minor, by and through their undersigned counsel hereby moves the Court, pursuant to Rule 224, SCACR, for an extension of time for 15 days to file its Appellant's Reply Brief in this action, or until **August 17, 2012**, to file said Brief. In support hereof, the undersigned states the following:

1. The undersigned needs additional time to properly complete the Brief due to (a) the complexity of the issues involved in this case, involving a brain-damaged child whose brain damage was allegedly caused by medical negligence; (b) the length of the record, including approximately six (6) inches of double-sided transcript pages and many hundreds of pages of exhibits from a 2 ½ week trial; (c) the complexity and 50 page length of Respondent's Initial Brief; (d) numerous other professional responsibilities and commitments in other cases which have caused counsel to be unable to complete the initial brief as previously envisioned. Those include preparation of a brief and appendix to the Supreme Court after the granting of a Petition for Writ of Certiorari, a multi-day CLE conference, and involvement in a case called for trial, necessitating this request for a further extension.
2. The current deadline is August 2, 2012.
3. Appellant submits that an extension would not unduly delay these proceedings and would not cause prejudice.
4. Respondent's counsel, Chilton Simmons, refused to Consent to this Motion.

WHEREFORE, Appellant respectfully requests until **August 17, 2012** in which to file the Initial Reply Brief in this action.

~signature page to follow~

Respectfully submitted,

GRAHAM LAW FIRM, P.A.

BY:



Edward L. Graham

P.O. Box 550

Florence, SC 29503

843-662-3281-T

843-665-0254-F

Attorney for Appellants

August 2, 2012

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Michael J. Baxley, Circuit Court Judge

Case No.: 2007-CP-10-1553

Jamesetta Washington, as Guardian ad Litem, for
Jayden Washington, a minor,Appellants,


v.

Edmund Rhett, Jr., M.D.; Low Country Obstetrics and Gynecology, P.A.;
Tenet South Carolina, Inc. d/b/a East Cooper Regional Medical Center.....Respondents.

PROOF OF SERVICE

The undersigned, an attorney in this matter certifies that I have this **2nd day of August, 2012**, served a copy of a Motion for Extension of Time to File Initial Reply Brief of **Appellant** upon counsel for the Respondent by depositing in the United States mail, first-class postage prepaid, addressed to:

Robert H. Hood, Esq.
Molly H. Craig, Esq.
Chilton Grace Simmons, Esq.
Deborah H. Sheffield, *of counsel*
Hood Law Firm, LLC
P.O. Box 1058
Charleston, SC 29402


By: _____
Edward L. Graham
Graham Law Firm, P.A.
P.O. Box 550
Florence, SC 29503
(843) 662-3281
Attorney for the Appellant



GRAHAM LAW

Shining a Light on Safety, Guiding the Way to Justice.

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Edward L. Graham
Mary H. Watters
Thomas W. Winslow*
*Licensed in SC and Washington DC,
Certified Civil Court Mediator

August 1, 2012

RECEIVED

AUG 06 2012

SC Court of Appeals

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

**RE: *Jamesetta Washington, as Guardian ad Litem of Jayden
Washington, a minor v. Edmund Rhett, Jr. et al.
Case # 2007-CP-10-1553***

Dear Ms. Kitchings:

Enclosed please find my firm's check in the amount of \$25.00 along with an original and 6 copies of a Motion for Extension of Time to File Appellant's Initial Reply Brief and Designation of Matter in the above referenced matter until August 17, 2012.

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

Yours very truly,

Edward L. Graham
Edward L. Graham

ELG/cah

Enclosures