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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

NOV 30 2015

SC Court of Appeals

Michael Nettles, Circuit Court Judge

Case No. 2013-CP-21-00587
Appellate Case No. 2015-001237

Genesie Fulton, individually and as Next Friend for
Bryson F., a minor Appellant,

v.

L. William Goldstein, M.D., individually and
d/b/a L. William Goldstein OB-GYN,..... Respondents.

**MOTION FOR EXTENSION OF TIME TO
FILE THE INITIAL BRIEF**

COMES NOW, the Appellant, Genesie Fulton, as Next Friend for Bryson F., a minor, by and through her undersigned counsel, and hereby moves the Court, pursuant to Rule 224, SCACR, for an extension of time for 30 days (which falls on a Sunday) to file the Initial Brief in this action, or until January 4, 2016 to file said Initial Brief. In support hereof, the undersigned states the following:

1. The current deadline is December 3, 2015.
2. Appellant submits that an extension would not unduly delay these proceedings and would not cause prejudice.

3. Respondent's counsel, Ellore A. Gaines and Molly H. Craig, have given their consent for this extension.

WHEREFORE, Appellant respectfully requests until **January 1, 2016** in which to file the Initial Brief in this action.

GRAHAM LAW FIRM, P.A.

By: _____

Edward L. Graham

J. Layton Ruffin

383 W. Cheves St.

PO Box 550

Florence, SC 29503

843/662-3281-T

800/859-7028 - EFax

ATTORNEYS FOR APPELLANTS

November 4, 2015

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

Michael Nettles, Circuit Court Judge

Case No. 2013-CP-21-00587
Appellate Case No. 2015.001237

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Genesie Fulton, individually and as Next Friend for
Bryson F., a minor.....Appellant,

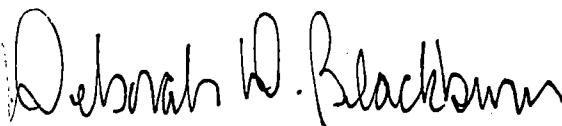
v.

L. William Goldstein, M.D., individually and
d/b/a L. William Goldstein OB-GYN,Respondents.

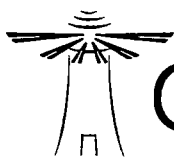
PROOF OF SERVICE

I, the undersigned employee of Graham Law Firm, P.A., attorneys for the Plaintiff, hereby certify that I have served a copy of the Appellant's Motion for Extension of Time to File the Initial Brief, this 25th day of November, 2015 by personally depositing a copy of same in the United States mail, postage prepaid, properly addressed as follows:

ELLOREE A GAINES ESQ
MOLLY H CRAIG ESQ
HOOD LAW FIRM LLC
PO BOX 1508
CHARLESTON SC 29402



DEBORAH D. BLACKBURN, Paralegal to
J.. Layton Ruffin



GRAHAM LAW

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

Edward L. Graham
Diane M. Rodriguez
J. Layton Ruffin

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NOV 30 2015
SC Court of Appeals

November 25, 2015

THE HONORABLE JENNY ABBOTT KITCHINGS
CLERK, SOUTH CAROLINA COURT OF APPEALS
1220 SENATE STREET
COLUMBIA, SC 29201

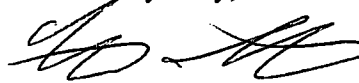
RE: Genesie Fulton, individually and as Next Friend for Bryson F., a minor v. L. William Goldstein, M.D., individually and d/b/a L. William Goldstein OB-GYN
Case No.: 2013-CP-21-00587
Allellate Case No. 2015-001237

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of the Appellant's Motion for Extension of Time to File the Initial Brief, along with a certificate of mailing. Please file the original and copies and return a clocked stamped copy to us in the envelope provided for your convenience. Also, enclosed is our law firm's check in the amount of \$25.00 for the filing fee.

Thank you for your attention to this matter.

Yours very truly,



J. Layton Ruffin

JLR/ddb

Enclosure

cc: ELLOREE A GAINES ESQ
MOLLY H CRAIG ESQ

GRAHAM LAW FIRM, P.A.

383 West Cheves Street, Florence, SC 29501

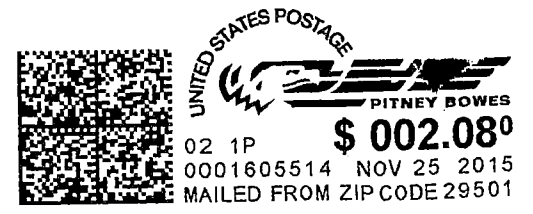
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Florence, SC 29501

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