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THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM FAIRFIELD COUNTY  
Court of Common Pleas  
Roger L. Couch, Circuit Court Judge

RECEIVED  
JAN 04 2016  
SC Court of Appeals

Appellate Case No. 2015-001964

Philip Ethier and Jeanne Ethier,  
Appellants,

v.

Fairfield Memorial Hospital; Guy R. Bibeau, M.D.; Tuomey  
Medical Professionals, Inc; and Pee Dee Emergency Medical  
Associates, PA,

Defendants,

Of whom Guy R. Bibeau, M.D., is the Respondent.

**APPELLANTS' MOTION FOR EXTENSION OF TIME**

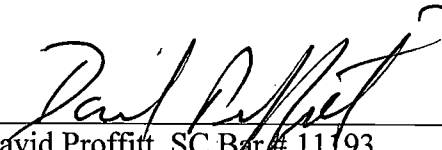
Appellants, by and through their undersigned counsel and pursuant to Rules 240 and 263(b), SCACR, move for an extension of time to file their initial brief and designation of matter on the following grounds.

Appellants received the transcript of the trial on December 7, 2015. Appellants' initial brief and designation of matter are due to be served on January 6, 2016. See Rules 208 and 209, SCACR. Counsel will not have sufficient time to review the transcript, research applicable law and prepare the initial brief and designation of matter by the current deadline.

Counsel requests an extension of thirty days, until February 5, 2016, to submit Appellants' initial brief and designation of matter. Appellants have not previously requested an extension of time.

Counsel has discussed this extension with counsel for Respondent and is informed that Respondent consents to the motion.

Respectfully submitted,



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Ronald Cox, SC Bar # 11129  
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Attorneys for Appellants

December 30, 2015

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM FAIRFIELD COUNTY  
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Appellate Case No. 2015-001964 **SC Court of Appeals**

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Philip Ethier and Jeanne Ethier,  
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v.

Fairfield Memorial Hospital; Guy R. Bibeau, M.D.; Tuomey  
Medical Professionals, Inc; and Pee Dee Emergency Medical  
Associates, PA,

Defendants,

Of whom Guy R. Bibeau, M.D., is the Respondent.

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**CERTIFICATE OF SERVICE**

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I, the undersigned lawyer or employee in the offices Proffitt & Cox, LLP, Attorneys for Appellants, do hereby certify that I have served the counsel or parties specified below in this action with a copy of the specified pleadings by causing a copy of the same to be X mailed by United States Mail, postage prepaid; \_\_\_ e-mailed; \_\_\_ faxed; \_\_\_ hand-delivered, to the following address:

Pleading: Appellants' Motion for Extension of Time

Counsel / Parties Served: Andrew F. Lindemann  
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Stanley L. Myers  
Moore Taylor Law Firm  
PO Box 5709  
W. Columbia, SC 29171  
[Stanley@mtlaw.com](mailto:Stanley@mtlaw.com)

A handwritten signature in cursive script, appearing to read "Stanley L. Myers", is written over a horizontal line.

December 30, 2015

# PROFFITT & COX

Attorneys at Law

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December 30, 2015

The Honorable Jenny Abbott Kitchings  
S.C. Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**

JAN 04 2016

**SC Court of Appeals**

RE: Philip Ethier et al. v. Fairfield Memorial Hospital et al.  
Appellate Case No. 2015-001964  
PC File No. 1236.01

Dear Ms. Kitchings:

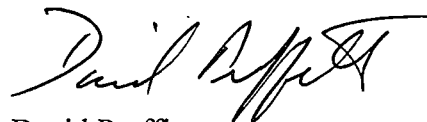
We represent Appellants in this appeal. Please find enclosed for filing the original and seven copies of Appellants' Motion for an Extension of Time to file and serve the initial brief and designation of matter. Please file the original and return a date-stamped copy to us in the enclosed envelope.

A check for the \$25.00 filing fee also is enclosed.

With kindest personal regards, I remain

Sincerely yours,

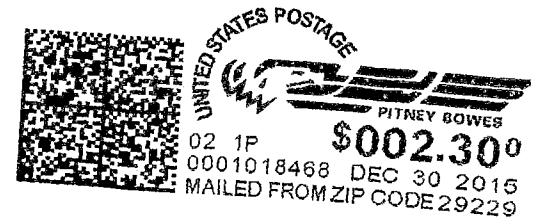
PROFFITT & COX, LLP



David Proffitt

RDP/nif  
Enclosures

cc: Andrew F. Lindemann (w/ enclosures)  
G. Murrell Smith, Jr. (w/ enclosures)  
David Holler (w/ enclosures)  
Stanley L. Myers (w/ enclosures)



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**SC Court of Appeals**

The Honorable Jenny Abbott Kitchings  
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