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**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Administrative Law Court

Shirley C. Robinson, Administrative Law Judge

Case No. 15-ALJ-07-0148-CC

South Carolina Department of  
Health and Environmental  
Control,

Respondent,

v.

Blessed Births, Inc. d/b/a  
Blessed Births Family  
Wellness and Birth Center,

Appellant.

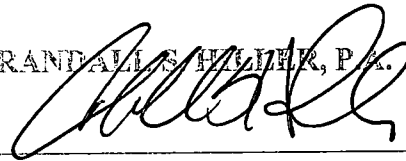
**MOTION FOR EXTENSION OF  
TIME TO FILE APPELLANT'S INITIAL BRIEF**

Appellant, by and through its undersigned counsel, move, pursuant to Rule 224, South Carolina Appellate Court Rules, for an extension of time within which to file their Initial Brief and Designation of Matter to be Included in the Record on Appeal.

This Motion is based on the grounds that due to a heavy trial case load counsel for the Appellant has not had sufficient time or opportunity to complete the initial brief and we would respectfully request a thirty (30) day extension of time to file Appellant's Initial Brief.

Respectfully submitted this 2<sup>nd</sup> day of March, 2016

RANDALL S. HILLER, P.A.



Randall S. Hiller  
S.C. Bar No.: 2513  
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(864) 232-0026  
Attorney for Appellant

Other Counsel of Record:  
Vito M. Wicevic  
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Columbia, SC 29201  
803-898-3353  
Attorney for Respondent

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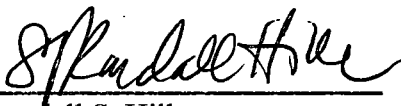
Blessed Births, Inc. d/b/a  
Blessed Births Family  
Wellness and Birth Center,

Appellant.

PROOF OF SERVICE

I certify that I have served the Appellant's Motion for Extension by depositing a copy of it in the United States Mail, postage prepaid, on March 3, 2016, addressed to Vito Wicevic, Esq., 2600 Bull St., Columbia, SC 29201.

South Carolina Department of

  
Randall S. Hiller  
850 Wade Hampton Blvd.  
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864-232-0026  
Attorney for Appellant

RANDALL S. HILLER, P.A.  
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March 3, 2016

SC Court of Appeals  
Attn: Clerk  
1015 Sumter St.  
Columbia, SC 29201

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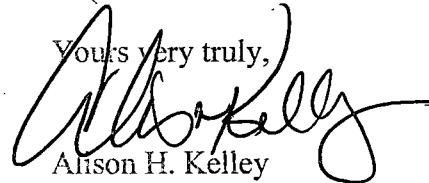
Re: *SCDHEC (Respondent) v. Blessed Births Family SC Court of Birth Center (Appellant)*

Dear Sir or Madam:

Please find enclosed one original and one copy of Appellant's Motion for Extension in the above matter. Please file the original with the Court and return the stamped copy to me in the envelope provided.

By copy of this letter I am providing opposing counsel with same.

Yours very truly,



Alison H. Kelley  
Paralegal to Randall S. Hiller

/ak

Enclosure.

Cc: Vito M. Wicevic, Esq.

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*(faint handwritten text)*

RANDALL S. HILLER, P.A.  
ATTORNEYS AT LAW

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GREENVILLE, SOUTH CAROLINA 29609



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