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STATE OF SOUTH CAROLINA
In the Court of Appeals

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JUL 15 2016
SC Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

Appellate Case No. 2016-001200
Horry County Civil Action No. 2014-CP-26-6593

Michael Moely as Special Administrator of the Estate
of Donelle Bronstein a/k/a Donelle M. Ruiters
a/k/a Donelle Moely Bronstein, Appellant,

v.

v.

Virginia Bell, F.N.P. and Inlet Medical Associates, P.A., Respondents.

**CONSENT MOTION OF APPELLANT FOR
AN EXTENSION OF TIME**

Pursuant to Rules 240 and 267 of the South Carolina Rules of Appellate Procedure, Appellant respectfully moves this Court for entry of a Consent Order granting a thirty (30) day extension of the Appellant's Initial Brief. This motion is filed with the consent of the Appellees, as evidenced by the attached **Exhibit A**.

The transcript of proceedings in this matter was received from the court reporter on June 26, 2016. The Appellant's Initial Brief is due thirty (30) days after receipt of the transcripts, which would be July 26, 2016. The new proposed deadline for the Appellant's Initial Brief would be August 25, 2016.

This Consent Motion is requested because Appellant's counsel is very new to the case, and would like additional time to further review the file. This extension should not affect any

✓

other deadlines or oral arguments in the case, as no briefing schedules or hearings have been set on this matter.

July 15, 2016

Respectfully submitted,

Susan F. Campbell / *with express permission*
by Shawn B. Deery, Esq.

Susan F. Campbell
MCGOWAN HOOD & FELDER, LLC
304 Church Street
Georgetown, SC 29440
(843) 833-8082
scampbell@mcgowanhood.com
Attorneys for Appellant

Other Counsel of Record:

Carmen Ganjehsani
Marian W. Scalise
Richardson Plowden & Robinson
2103 Farlow Street
Myrtle Beach, SC 29577
(843) 448.1008
Attorneys for Respondents

EXHIBIT A

McGowan, Hood & Felder, LLC

Chad A. McGowan (SC,GA,NC)
S. Randall Hood
John G. Felder, Jr.
W. Jones Andrews, Jr.
Jordan C. Calloway
Susan F. Campbell
Deborah Casey (NC)*
Ashley White Creech
Shawn B. Deery



Chance M. Farr (NC)
Lara Pettiss Harrell
Patrick M. Killen
William A. McKinnon (SC,DC)
Anna S. Magann
Robert V. Phillips
James Stephen Welch* (SC,OK)
Joseph G. Wright, III*
Of Counsel*

July 7, 2016

Via E-mail to

cganjehsani@richardsonplowden.com

Carmen V. Ganjehsani, Esq.
Richardson Plowden, Attorneys at Law
P.O. Drawer 7788
Columbia, SC 29202

Via E-mail to

mscalise@richardsonplowden.com

Marian Scalise
Richardson Plowden, Attorneys at Law
P.O. Drawer 3646
Myrtle Beach, SC 29578

RE: Michael Moely v. Virginia Bell, F.N.P.
Appellate Case No. 2016-001200
Civil Action No. 2014-CP-26-06593

Dear Carmen and Marian:


We received the court reporter's transcript of proceedings in the above-referenced matter on Sunday, June 26, 2016. By my calculations, the Appellant's Initial Brief should be served and filed on or before July 26, 2016. As attorneys for the Respondents, would you agree to a thirty day extension of this deadline? The new deadline would be August 25, 2016. We are very new to the case and request the additional time to further review the file.

If you are in agreement, please sign below and return to me by fax or e-mail. We appreciate your consideration of this request, and if you have any questions, please contact me or Anna Magann, my associate attorney, if I am unavailable.

Sincerely,


Susan F. Campbell

I CONSENT:





Carmen V. Ganjehsani or Marian Scalise Date
Attorneys for Virginia Bell, F.N.P. and Inlet Medical Associates, P.A.

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Michael Maely as Special Administrator of the Estate
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a/k/a Donelle Maeley Bronstein,.....Appellant,

v.

Virginia Bell, F.N.P. and Inlet Medical Associates, P.A.,..... Respondents

PROOF OF SERVICE

I certify that I have served the Consent Motion of Appellant for an Extension of Time on Virginia Bell, F.N.P. and Inlet Medical Associates, P.A. by depositing a copy of it in the United States Mail, postage prepaid, on July 15, 2016, addressed to their attorney of record as follows:

Carmen Ganjehsani
Richardson Plowden, Attorneys at Law
P.O. Drawer 7788
Columbia, SC 29202

Marian W. Scalise
Richardson Plowden, Attorneys at Law
P.O. Box 3646
Myrtle Beach, SC 29577

July 15, 2016



By
McGowan, Hood & Felder
304 Church Street
Georgetown, SC 29440
843-833-8082
Attorneys for Appellant

McGowan, Hood & Felder, LLC

Chad A. McGowan (SC,GA,NC)
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Joseph G. Wright, III*
Of Counsel*

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SC Court of Appeals

Via Hand Delivery

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: Michael Moely v. Virginia Bell, F.N.P.
Appellate Case No. 2016-001200
Civil Action No. 2014-CP-26-06593

Dear Ms. Kitchings:

Enclosed for filing please find the original and six copies of the Consent Motion of Appellant for Extension of Time, along with the filing fee check of \$25.00, in the above matter. Please file the same in your customary manner and return a copy to me.

By copy of this letter, I am serving all counsel of record.

Sincerely,

Susan S. Campbell /asm
Attorney for Appellant

Enclosures

cc: Marian W. Scalise, Esq.
Carmen V. Ganjehsani, Esq.
Richardson Plowden & Robinson
2103 Farlow Street
Myrtle Beach, SC 29577
Attorneys for Appellees