

THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Appeal from Charleston County  
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

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Opinion No. 5403 (S.C. Ct. App. filed May 4, 2016)

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Virginia L. Marshall and Todd W. Marshall,

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SEP 21 2016

S.C. SUPREME COURT

Respondents,

v.

Kenneth A. Dodds, M.D., Charleston Nephrology Associates, LLC,  
Georgia Roane, M.D., and Rheumatology Associates, P.A.,

Petitioners.

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**MOTION OF PETITIONERS  
GEORGIA ROANE, M.D., AND RHEUMATOLOGY ASSOCIATES, P.A.,  
FOR EXTENSION OF TIME TO FILE/SERVE  
PETITION FOR A WRIT OF CERTIORARI  
TO THE COURT OF APPEALS**

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YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
James E. Scott, IV (SC Bar No. 09063)  
Perry M. Buckner, IV (SC Bar No. 100031)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488

*Counsel for Petitioners  
Georgia Roane, M.D., and  
Rheumatology Associates, P.A.*

TO: THE HONORABLE JUSTICES OF THE SUPREME COURT OF SOUTH CAROLINA

COME NOW Petitioners Georgia Roane, M.D., and Rheumatology Associates, P.A. (hereinafter collectively referred to in the singular as “Dr. Roane”), by and through their undersigned counsel, on the grounds stated below, and, pursuant to Rule 263(b), SCACR, as well as the Court’s order of July 16, 2014, regarding Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals, hereby move for an extension of five (5) days’ time to file/serve her petition to this Court for issuance of a writ of certiorari to the Court of Appeals to review its decision in this matter.

1. The Court of Appeals denied rehearing on August 19, 2016, making the deadline to file/serve a petition for writ of certiorari today, September 19, 2016, pursuant to Rule 242(c), SCACR.

2. Due to other time commitments, both work- and non-work-related, and the substance of this case (which the Court of Appeals decided via published opinion, *see* Marshall v. Dodds, Op. No. 5403 (Ct. App. filed May 4, 2016) (Shearouse Adv. Sh. No. 18 at 54)) the undersigned counsel would greatly appreciate five (5) additional days, beyond today’s date, to finish preparation of Dr. Roane’s petition seeking this Court’s review of the Court of Appeals’ decision via writ of certiorari, and the undersigned humbly submits that there is good cause to allow the requested dispensation: It is in furtherance of the interests of justice; it

will not work any undue prejudice upon any other party; and it is consistent with the extension protocol established by the Court's aforementioned order of July 16, 2014.

WHEREFORE, Dr. Roane respectfully requests that this Honorable Court allow her five (5) days from today, September 19<sup>th</sup>, to file/serve her petition for writ of certiorari, i.e., to extend the deadline through next Monday, September 26, 2016.<sup>1</sup> Additionally, Dr. Roane respectfully requests that the Court hold her present petition deadline in abeyance until it acts upon this motion.

**<SIGNED ON THE FOLLOWING PAGE>**

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<sup>1</sup> Computing time pursuant to Rule 263(a), SCACR, the 5<sup>th</sup> day after today will be Saturday, September 24, 2016; accordingly, the 5-day period will run through Monday, September 26<sup>th</sup>, i.e., "the end of the next day which is neither a Saturday, Sunday nor [a state or federal] holiday."

Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

By: 

Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis, Jr. (SC Bar No. 12084)  
James E. Scott, IV (SC Bar No. 09063)  
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*Counsel for Respondents  
Georgia Roane, M.D., and  
Rheumatology Associates, P.A.*

Charleston, South Carolina

Dated: 9/19/16

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Respondents.

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**PROOF OF SERVICE**

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YOUNG CLEMENT RIVERS, LLP  
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*Counsel for Respondents  
Georgia Roane, M.D., and  
Rheumatology Associates, P.A.*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Respondents Georgia Roanè, M.D., and Rheumatology Associates, P.A., do hereby certify that I have served the **MOTION OF PETITIONERS GEORGIA ROANE, M.D., AND RHEUMATOLOGY ASSOCIATES, P.A., FOR EXTENSION OF TIME TO FILE/SERVE PETITION FOR A WRIT OF CERTIORARI TO THE COURT OF APPEALS** on all other parties of record by depositing a copy of the same in the United States Mail, postage prepaid, on September 19, 2016, addressed as follows to their counsel of record:

Blake A. Hewitt, Esquire  
John S. Nichols, Esquire  
Bluestein Nichols Thompson Delgado, LLC  
P.O. Box 7965  
Columbia, SC 29202

*-and-*

J. Edward Bell, III, Esquire  
Bell Legal Group, LLC  
P.O. Box 2590  
Georgetown, SC 29442

*-and-*

C. Carter Elliott, Jr., Esquire  
Elliott & Phelan, LLC  
P.O. Box 1405  
Georgetown, SC 29442

*Counsel for Respondents*

*Virginia L. Marshall and Todd W. Marshall*

James B. Hood, Esquire  
Robert H. Hood, Esquire  
H. Cooper Wilson, III, Esquire  
Deborah Harrison Sheffield, Esquire  
Hood Law Firm, LLC  
172 Meeting Street  
Charleston, SC 29401

*Counsel for Petitioners*

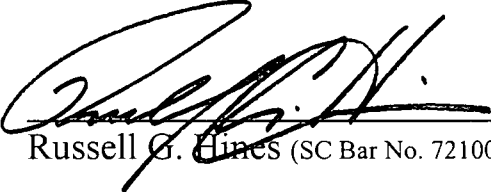
*Kenneth A. Dodds, M.D. and  
Charleston Nephrology Associates, LLC*

Thomas R. Goldstein, Esquire  
Belk, Cobb, Infinger & Goldstein, P.A.  
P.O. Box 71121  
Charleston, SC 29415-1121  
***Counsel for Petitioner***  
***Kenneth A. Dodds, M.D.***

I further certify that I have filed said Motion with the Court of Appeals, along with this Proof of Service, by depositing a copy of the same in the United States Mail, postage prepaid, on September 19, 2016, addressed as follows:

The Honorable Jenny Abbott Kitchings, Clerk  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

By:   
Russell G. Hines (SC Bar No. 72100)  
***Counsel for Respondents***  
***Georgia Roane, M.D., and***  
***Rheumatology Associates, P.A.***

Charleston, South Carolina

Dated: 9/19/16

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