

THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

---

**RECEIVED**

SEP 27 2016

APPEAL FROM RICHLAND COUNTY  
In the Court of Common Pleas

S.C. SUPREME COURT

G. Thomas Cooper, Jr., Presiding Judge

---

Appellate Case No. 2014-001115

---

Kristin Joseph P.T., Thomas N. Joseph, M.D.,  
and William G. McCarthy, M.D.,.....Appellants,

v.

South Carolina Department of Labor, Licensing  
and Regulation, South Carolina Board of Physical  
Therapy,.....Respondent,

and

South Carolina Chapter, American Physical  
Therapy Association, Joseph M. McKowen, P.T.,  
Sabrina Queen Bridges, PTA, and Amalia W. Kirby, PTA,.....Respondents.

---

**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENTS' PETITION  
FOR REHEARING**

---

The undersigned, as counsel for Respondents South Carolina Chapter, American Physical Therapy Association, and South Carolina Department of Labor, Licensing and Regulation, South Carolina Board of Physical Therapy, hereby move for a Fifteen (15) day extension of time to file their Petition for Rehearing. This Motion is made on the grounds that additional time is needed to prepare and file the Petition for Rehearing. This extension request is not intended for purposes of delay. Further, there would be no prejudice to the

parties by an extension of time. By the undersigned's calculations the extension, if granted, would extend Respondents' deadline for filing the Petition for Rehearing to October 14, 2016.

WHEREFORE, Respondents respectfully pray that this Court extend the deadline for the service and filing their Petition for Rehearing to October 14, 2016.

Respectfully submitted,

By: 

S. Jahue Moore  
John C. Bradley, Jr.  
MOORE TAYLOR LAW FIRM, PA  
1700 Sunset Boulevard  
West Columbia, SC 29169  
803-796-9160  
803-791-8410 (Fax)  
[john@mttlaw.com](mailto:john@mttlaw.com)

N. Thomas Connally, III  
HOGAN LOVELLS US LLP  
Park Place II  
7930 Jones Branch Drive, Ninth Floor  
McLean, VA 22102  
T: 703.610.6100  
F: 703.610.6200  
[tom.connally@hoganlovells.com](mailto:tom.connally@hoganlovells.com)  
[marques.richeson@hoganlovells.com](mailto:marques.richeson@hoganlovells.com)

*Counsel for Respondent South Carolina  
Chapter, American Physical Therapy  
Association*

Monteith P. Todd  
SOWELL GRAY STEPP & LAFFITTE,  
L.L.C.  
1310 Gadsen Street  
Post Office Box 11449  
Columbia, SC 29211  
T: 803.929.1400  
mtodd@sowellgray.com

*Counsel for Respondent South Carolina  
Department of Labor, Licensing and  
Regulation, South Carolina Board of  
Physical Therapy*

West Columbia, SC  
September 27, 2016

THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

---

**RECEIVED**

SEP 27 2016

S.C. SUPREME COURT

APPEAL FROM RICHLAND COUNTY  
In the Court of Common Pleas

G. Thomas Cooper, Jr., Presiding Judge

---

Appellate Case No. 2014-001115

---

Kristin Joseph P.T., Thomas N. Joseph M.D.,  
and William G. McCarthy, M.D.,.....Appellants,

v.

South Carolina Department of Labor, Licensing  
and Regulation, South Carolina Board of Physical  
Therapy,.....Respondent,

and

South Carolina Chapter, American Physical  
Therapy Association, Joseph M. McKowen, PT,  
Sabrina Queen Bridges, PTA, and Amalia W. Kirby, (PTA),.....Respondents.

---

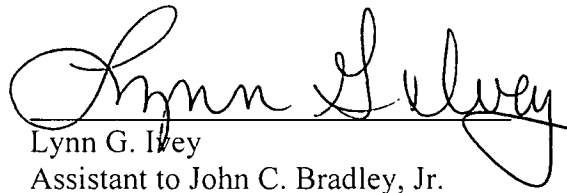
**PROOF OF SERVICE**

---

I certify that I have served the Motion for Extension of Time to File Respondents' Petition for Rehearing by depositing a copy of same in the United States Mail, postage prepaid, and by electronic mail on September 27, 2016, addressed to attorneys of record as follows:

M. Elizabeth Crum  
Ariail Kirk  
McNair Law Firm, P.A.  
P.O. Box 11390  
Columbia, SC 29211  
[lcrum@mcnair.net](mailto:lcrum@mcnair.net)  
[akirk@mcnair.net](mailto:akirk@mcnair.net)

Darra Coleman  
Office of Advice Counsel  
SC Department of Labor, Licensing  
& Regulation  
110 Centerview Drive  
Columbia, SC 29211  
[darra.coleman@llr.sc.gov](mailto:darra.coleman@llr.sc.gov)



Lynn G. Ivey  
Assistant to John C. Bradley, Jr.

West Columbia, South Carolina  
September 27, 2016