

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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S.C. SUPREME COURT

APPEAL FROM YORK COUNTY
Court of Common Pleas

S. Jackson Kimball, Circuit Court Judge

Case No. 2009-CP-46-5195
Appellate Case No. 2015-002135

Angela Patton, as Next Friend of Alexia L., a minor,Petitioner

v.

Dr. Gregory A. Miller, Rock Hill Gynecological & Obstetrical Associates, P. A.
and Amisub of South Carolina, d/b/a Piedmont Medical Center,Respondents.

MOTION FOR EXTENSION

Pursuant to Rule 240, SCACR, Petitioner Angela Patton, as Next Friend of Alexia L., a minor, requests a thirty (30) day extension of the deadline for filing and serving its Reply to Respondent's Return Brief. The current deadline for the Reply is October 10, 2016. Petitioner respectfully submits this request is needed to address arguments submitted by Respondents in their Return not wholly identical to those previously argued and to allow time to print all necessary copies of the Reply. During the same period of time, a "State of Emergency" was declared by the Governor of South Carolina in anticipation of the landfall of hurricane Matthew. Government offices were closed Thursday, October 6, and Friday, October 7. Chief Justice of the South Carolina Supreme Court issued a memorandum on October 4, 2016, directing that Court proceedings would be cancelled consistent with recommendations by the South Carolina

Emergency Management Division (SCEMD) recommendations. Most residential areas and many private businesses, including our offices located in Florence and Sumter Counties, lost electrical service and internet service for several days. Electrical power was restored to our offices in Florence late Monday afternoon and to Sumter midafternoon on Tuesday, October 11, the day after the Brief was due. In addition, Counsel for the Petitioner was preparing for a three-week trial in North Carolina that began Monday October 10, 2016 and had to leave for NC on Sunday to appear in Court in NC for motions and jury selection on Monday morning.

Accordingly, Petitioner respectfully requests this Court grant the undersigned's motion for an extension of time of thirty (30) days.

By:  for

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October 13, 2016

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PROOF OF SERVICE

The undersigned, an attorney in this matter for the Petitioner, certifies that I have this 13th day of October, 2016 served copies of the Motion for Extension upon counsel for the Respondents by depositing them in the United States mail, first-class postage prepaid, addressed to:

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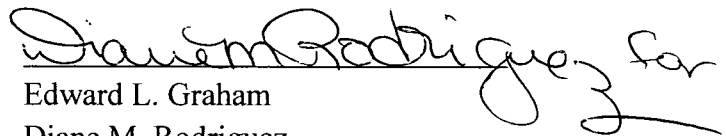
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South Carolina, Inc. d/b/a Piedmont
Medical Center*

GRAHAM LAW FIRM

BY:

A handwritten signature in cursive script that reads "Diane M. Rodriguez for". The signature is written in black ink and is positioned above the typed name of Diane M. Rodriguez.

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Diane M. Rodriguez

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October 13, 2016