

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

NOV 04 2016

**SC Court of Appeals**

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

Case No. 2016-CP-26-0166  
Appellate Case No. 2016-001499

Jeanne Beverly, Individually and on behalf of others similarly situated,.....Appellant,

v.

Grand Strand Regional Medical Center, LLC .....Respondent.

**RESPONDENT GRAND STRAND REGIONAL MEDICAL CENTER, LLC'S  
MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF**

James Lynn Werner  
William R. Thomas  
Katon E. Dawson Jr.  
Parker Poe Adams & Bernstein LLP  
1221 Main Street, Suite 1100  
Post Office Box 1509 (29202)  
Columbia, South Carolina 29201  
Tel: 803-255-8000  
Fax: 803-255-8017  
jimwerner@parkerpoe.com  
willthomas@parkerpoe.com  
katondawson@parkerpoe.com

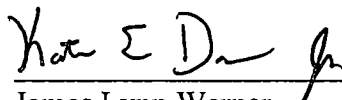
*Attorneys for Respondent  
Grand Strand Regional Medical Center, LLC*

NOW COMES Respondent Grand Strand Regional Medical Center, LLC ("GSRMC"), pursuant to 240(a), SCACR, and respectfully requests an extension of time of thirty (30) days within which to file its Initial Brief.

As a result of Respondent GSRMC's counsels' work schedule, GSRMC respectfully contends that good causes exists for an extension of time to file its Initial Brief. Additionally, Appellant requested and received an extension prior to filing her Initial Brief.

WHEREFORE, Respondent GSRMC respectfully requests an order granting an extension of thirty (30) days to file its Initial Brief, up to and including, Monday, December 19, 2016.

Respectfully submitted,



---

James Lynn Werner  
William R. Thomas  
Katon E. Dawson Jr.  
Parker Poe Adams & Bernstein LLP  
1221 Main Street, Suite 1100  
Post Office Box 1509 (29202)  
Columbia, South Carolina 29201  
Tel: 803-255-8000  
Fax: 803-255-8017  
jimwerner@parkerpoe.com  
willthomas@parkerpoe.com  
katondawson@parkerpoe.com

*Attorneys for Respondent  
Grand Strand Regional Medical Center, LLC*

November 4, 2016  
Columbia, SC

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

---

Case No. 2016-CP-26-0166  
Appellate Case No. 2016-001499

---

**RECEIVED**

NOV 04 2016

**SC Court of Appeals**

Jeanne Beverly, Individually and on behalf of others similarly situated,.....Appellant,

v.

Grand Strand Regional Medical Center, LLC .....Respondent.

---

**PROOF OF SERVICE**

---

The undersigned hereby certifies that on November 4, 2016, he served the foregoing **RESPONDENT GRAND STRAND REGIONAL MEDICAL CENTER, LLC's MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF** on all parties listed below by placing a copy of it in the United States Mail, first class postage prepaid, addressed as follows:

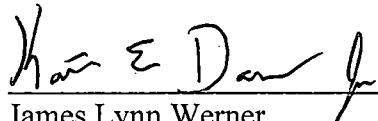
John G. Felder, Jr.  
McGowan, Hood & Felder, LLC  
1517 Hampton Street  
Columbia, SC 29201

Chad A. McGowan  
Jordan C. Calloway  
McGowan, Hood & Felder, LLC  
1539 Health Care Drive  
Rock Hill, South Carolina 29732

Roy Harmon  
Sidney L. Major, Jr.  
Harmon & Major, P.A.  
PO Box 8954  
Greenville, SC 29604

Jeff C. Chandler  
The Chandler Law Firm  
Bank of America Building  
2501 Oak Street  
Myrtle Beach, South Carolina 29577

Attorney for Appellants



---

James Lynn Werner  
William R. Thomas  
Katon E. Dawson Jr.  
Parker Poe Adams & Bernstein LLP  
1221 Main Street, Suite 1100  
Post Office Box 1509 (29202)  
Columbia, South Carolina 29201  
Tel: 803-255-8000  
Fax: 803-255-8017  
jimwerner@parkerpoe.com  
willthomas@parkerpoe.com  
katondawson@parkerpoe.com

*Attorneys for Respondent  
Grand Strand Regional Medical Center, LLC*



Katon E. Dawson, Jr.  
Associate  
Telephone: 803.253.6854  
Direct Fax: 803.255.8017  
katondawson@parkerpoe.com

Atlanta, GA  
Charleston, SC  
Charlotte, NC  
Columbia, SC  
Greenville, SC  
Raleigh, NC  
Spartanburg, SC

November 4, 2016

**Via Hand Delivery**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29211

**RECEIVED**  
NOV 04 2016  
SC Court of Appeals

**Re: *Jeanne Beverly Individually and on behalf of other similarly situated v. Grand Strand Regional Medical Center, LLC; Civil Action No. 2016-CP-26-0116***  
**First Motion for Extension of time to File Initial Brief**

Dear Mrs. Kitchings:

Enclosed are an original and seven copies of Respondent's Motion for Extension of Time to File Initial Brief and Proof of Service, and our firm check in the amount of \$25.00 in the above-referenced lawsuit. Please return a file-stamped copy of the Respondent's Motion and Proof of Service to my courier. In the meantime, we ask that the current deadline for filing be stayed pending resolution of this request.

By copy of this letter, I am serving counsel for the Appellant with a copy of the Motion and Proof of Service.

Thank you for your attention to this request.

Sincerely,

Katon E. Dawson, Jr.

KED:bg  
Enclosures

cc: John G. Felder, Jr.  
Chad A. McGowan  
Jordan C. Calloway  
Roy Harmon  
Sidney L. Major, Jr.  
Jeff C. Chandler

PPAB 3475026v1